

*March 13, 2024 in re Delgado v Trump for President -
Deposition of Eric Trump*

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
3 CASE NO. 19-CV-11764 (AT) (KHP)
4

5 ARLENE DELGADO,

6 Plaintiff,

7 vs.

8 DONALD J. TRUMP FOR PRESIDENT,
9 ET AL.,

10 Defendants.

11 LOCATION: Remote Audio-Video
12 Communication

13 DATE: March 13, 2024

14 TIME: 10:00 AM ET to 12:45 PM ET
15
16

17 DEPOSITION OF ERIC TRUMP

18 Taken before Leila Harris, LCR, FPR,
19 Stenographic Court Reporter, Notary Public State of
20 Florida, pursuant to Notice of Taking Deposition in
21 the above-styled cause.
22
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24
25

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P R O C E E D I N G S

STENOGRAPHER: Pursuant to stipulation,
the oath administered by me here today will
have the same force and effect as if it were
given to the witness while they were physically
present before me in the State of Florida and I
were acting in my capacity as a Florida Notary.

ERIC TRUMP

was called as a witness, and after having been first
remotely duly sworn was deposed and testified as
follows:

THE WITNESS: I do.

EXAMINATION

BY MS. DELGADO:

Q Good morning, Eric. How are you?

A Good morning, AJ. How are you?

Q Is it okay if I refer to you as Eric
instead of Mr. Trump, or let me know how you would
like for me to refer to you?

A As long as it's okay if I refer to you as
AJ.

Q Sounds good. Okay.

So I'm just -- I assume you've been
deposed before, but nonetheless, for the record I'd
like to go over some ground rules.

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1 Is that okay?

2 A Yes, ma'am.

3 Q Okay. So you've been sworn to tell the
4 truth; do you understand that?

5 A I do.

6 Q And you're required to tell the truth
7 under penalties of perjury; do you understand that?

8 A I do.

9 Q And if you don't understand a question as
10 we go through, please, let me know so I have a
11 chance to rephrase it. Also, your attorney might
12 have objections that she makes throughout the
13 deposition, let her, especially for purposes of the
14 court reporter and there not being cross-talk, let
15 her get her objection on the record. And then
16 usually, depending on the type of objection, you can
17 then answer.

18 Also, as far as giving answers, if
19 you could say yes, no, maybe instead of ah-huh or
20 uh-huh, that also helps the court reporter. And
21 let's see, in terms of -- I'm trying to think if
22 there's anything else.

23 If you don't understand a question --
24 breaks. If you'd like to take a break at any point,
25 please let me know. The same goes for any of the

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1 attorneys on the Zoom. I know I'll probably have to
2 take a couple of breaks because my son is in the
3 other room.

4 So if for any reason, a bathroom
5 break, whatnot, just don't discuss your testimony,
6 Eric, during a break with your attorney.

7 A Sounds good.

8 And AJ, how long do you think we'll
9 be here just out of curiosity? I think you said --
10 did you say two hours to these guys just for my own
11 planning purposes?

12 Q Yeah. Alan Garten had asked me what I
13 estimate. I think three hours. But depending on if
14 we -- if we make good progress, I think probably far
15 less. I'm going to try to wrap this up, especially
16 for my own reasons. My son and I have something we
17 need to do today.

18 I'll try to get through this as
19 quickly as we can, as efficiently as we can. A lot
20 of that depends on the answers given, obviously, but
21 it could be anywhere between 90 minutes to three
22 hours, I think.

23 A Great. Sounds good.

24 Q Great. Okay.

25 All right. So let's get started.

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1 Please state your name for the
2 record?

3 A Eric Trump.

4 Q And I'm not going to ask you your address,
5 but what city do you reside in?

6 A Jupiter, Florida.

7 Q Great. When did move to Florida?

8 A Approximately 2020 or 2021.

9 Q Okay. What is your occupation?

10 A Real estate.

11 Q Real estate executive; is that correct?

12 A Yes.

13 Q Okay. What is -- you work at the Trump
14 Organization; is that correct?

15 A I work at the Trump Organization.

16 Q What is your title there?

17 A EVP.

18 Q EVP.

19 A Executive vice president.

20 Q Thank you.

21 Did you ever work for the Trump
22 Campaign?

23 A I was never paid by the Trump Campaign.
24 No. I never directly worked for the Trump Campaign,
25 to the best of my knowledge.

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1 Q What about unpaid work?

2 A I was certainly a surrogate for my father,
3 but I was never paid by the campaign. Again, to the
4 best of my knowledge. But, you know, I certainly
5 did many campaign events, and I was certainly
6 involved in the political process. But no, I was
7 always on the Trump Organization side.

8 Q Okay. Right. Just to be clear, I don't
9 mean advocacy work that you did for your father that
10 is similar to work on a campaign, I mean were you
11 ever unpaid at actual -- doing actual work for the
12 campaign?

13 MS. HABBA: Asked and answered.

14 You can answer.

15 MR. BLUMETTI: Objection to form as well.

16 THE WITNESS: As I said AJ, I did a lot of
17 political work. I certainly was a great
18 advocate for my father. I certainly dealt with
19 people on the campaign.

20 But to the best of my knowledge, I never
21 worked, and when I say worked, I'm talking
22 about formal capital W worked, was employed
23 formally by the campaign, to the best of my
24 knowledge.

25

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1 BY MS. DELGADO:

2 Q Okay. You produced some documents that
3 were sent to me yesterday by Ms. Habba's firm.

4 Have you had a chance to review those
5 documents?

6 A Very vaguely, yes.

7 Q Okay. And is that the totality of what
8 you intend to produce, what was sent yesterday?

9 A I believe that was the totality of the
10 searches that we had. Yes.

11 Q Okay. Have you had any contacts with any
12 of the defendants, Mr. Priebus or Mr. Spicer about
13 this case?

14 MS. HABBA: Objection to form.

15 You can answer.

16 THE WITNESS: About this case, no.

17 BY MS. DELGADO:

18 Q Have you had any conversations with
19 Mr. Priebus or with Mr. Spicer about this case?

20 A No.

21 Q You have -- I'm sorry?

22 A I have not, no.

23 Q You have not. Okay.

24 Have you had any conversations or
25 communications, written or oral, with Mr. Jason

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1 Miller about this case?

2 A Certainly not detailed conversations. I
3 don't see Jason all that often but I know -- I
4 think -- I -- I don't think so. I mean, anything's
5 possible, but certainly haven't with Reince or -- or
6 Spicer. I see Jason slightly more than those guys,
7 but not to the best of my knowledge.

8 Q Okay. Is there anything that would help
9 refresh your recollection, such as looking through
10 text messages you might have with Mr. Miller?

11 A The two of us don't text all that often,
12 so probably not.

13 Q What about if you were to search for
14 e-mails you might have with Mr. Miller?

15 A As I said I just -- you know, I see Jason
16 at certain political events and, you know, we're --
17 we're obviously very cordial to one another. But I
18 don't e-mail Jason all that often. And if I do,
19 it's usually about a press request or something
20 along those lines about an unrelated subject.

21 Q Fair enough.

22 What about Mr. Blumetti, have you had
23 any communications, or oral or written of any kind
24 with Mr. Blumetti defendant's counsel, the
25 campaign's counsel?

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1 A Who?

2 Q Mr. Blumetti, he's on the call. The Trump
3 Campaign's counsel in this matter?

4 A Is that Jared?

5 Q Yes.

6 A I spoke to Jared for the first time
7 yesterday.

8 MS. HABBA: I'm just going to advise my
9 client not to speak about anything priveleged.
10 Of course, he can address your answers.

11 THE WITNESS: Jared, if we've ever spoken
12 before in years past on something totally
13 unrelated, god bless, I'm sorry, but I think --
14 I think yesterday was the first time I ever
15 spoke to Jared.

16 BY MS. DELGADO:

17 Q So you spoke to the Trump Campaign's
18 counsel yesterday about this case?

19 A Just in preparation for -- for what today
20 was going to look like, yes.

21 Q What was the content of that
22 communication?

23 MS. HABBA: You need to not address the
24 content of that communication. I was also on
25 that call, it was a privileged conversation.

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1 MS. DELGADO: The fact that you were on
2 that call does not mean it was a privileged
3 conversation. I believe the privilege would be
4 waived by the fact that it was with an attorney
5 with whom he has no attorney-client
6 relationship.

7 But we can revisit that the court.

8 MS. HABBA: We can. It would be a common
9 interest privilege, actually.

10 MS. DELGADO: We'll revisit that.

11 You don't need to answer that, Eric.

12 Thank you.

13 BY MS. DELGADO:

14 Q What materials did you read in preparation
15 for this deposition, if any?

16 A Not a whole lot, AJ. Maybe a couple of
17 the back-and-forth text messages between you and I
18 that were part of that package, but that's about it.

19 Q So everything you reviewed is part -- it
20 would be found in the production that I received?

21 A That's correct.

22 Q Is that correct?

23 I'm sorry. I talked over you.

24 A Yes. AJ, that's correct.

25 Q Okay. And by the way, I should have said

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1 this during the ground rules, if I interrupt you
2 it's not intentional. Usually during Zoom, even in
3 person, there tends to be cross-talk or delay. I
4 apologize in advance. Let me know, I'm not done
5 speaking and vice versa please. Thank you.

6 Okay. Eric, was I denied a White
7 House job because I was pregnant?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: AJ, I wasn't part of the
10 White House apparatus. I have no idea.

11 BY MS. DELGADO:

12 Q I'm sorry, you have what?

13 A AJ, I was not part of the White House
14 apparatus. You'd have to ask somebody over there.

15 Q Is it possible that was the reason based
16 on what you know?

17 MS. HABBA: Objection. Speculation.

18 MR. BLUMETTI: Objection to form.

19 MS. HABBA: Form.

20 THE WITNESS: I'm not going to speculate,
21 AJ.

22 BY MS. DELGADO:

23 Q Do you know if it was definitely not the
24 reason?

25 MS. HABBA: Objection to form.

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1 THE WITNESS: Again AJ, that wasn't my
2 domain. I'm not going to speculate.

3 BY MS. DELGADO:

4 Q So it would be fair to say you don't know
5 one way or the other?

6 A AJ, I'm not going to speculate. Again, I
7 was not part of the White House. I never had role
8 in government. I'm just not going to speculate on
9 that question.

10 Q Who did make the hiring decisions for the
11 White House in 2016 and 2017?

12 MR. BLUMETTI: Objection to form.

13 THE WITNESS: I don't know.

14 BY MS. DELGADO:

15 Q I can rephrase it.

16 Who in -- in your understanding, who
17 made the White House hiring decisions in 2016?

18 A When you hire for the White House, you
19 hire thousands of people, it's not -- it's not a
20 team of seven or ten where one person would make a
21 decision. So I could have -- I would have no idea
22 who made every White House hiring position. I would
23 assume that would be a very large team of people.

24 Q Did your father make decisions for his
25 White House hiring?

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1 A I'm sure my father made certain decisions
2 for White House firing -- hiring.

3 Q Do you know if Reince Priebus made certain
4 decisions for White House hiring?

5 A I have no idea. You have to ask Reince.

6 Q Are you aware whether I was denied a White
7 House job because I complained of discrimination?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: AJ, as I said a couple of
10 times, I was not part of the White House or the
11 administration. Ask somebody over there.

12 BY MS. DELGADO:

13 Q Did the campaign or individuals who worked
14 within the campaign make hiring decisions for the
15 White House?

16 MR. BLUMETTI: Objection. Form.

17 THE WITNESS: I believe I've already
18 answered this question. I don't know who made
19 the hiring decisions for the White House.

20 Aside from a transition team, I have no idea
21 who would have made each and every decision.

22 BY MS. DELGADO:

23 Q So based on your personal knowledge, and I
24 understand you've limited it to -- that you're not
25 aware of what exactly might have gone on, I'm only

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1 asking you your personal knowledge.

2 If someone were to ask you why was AJ
3 Delgado not hired for the White House, what would
4 your answer be?

5 MS. HABBA: Objection. Asked and
6 answered.

7 THE WITNESS: I have first -- I have no
8 firsthand knowledge. And AJ, respectfully,
9 it's a little awkward because, you know, you
10 and I were people who, I think, had mutual
11 respect for one another. I mean, I think there
12 were a lot of unsavory articles and other
13 things. I mean, I was reading that and a lot
14 of other people reading those.

15 But again, I have no firsthand knowledge
16 as to why, you know, you didn't get a job at
17 the White House. That's not my world. I
18 didn't work there. I didn't make those
19 decisions. I was focused on my own domain.

20 BY MS. DELGADO:

21 Q When you say "unsavory articles," what are
22 you referring to?

23 A I think there was a lot of -- I think
24 there was a good deal of negative -- negative press
25 that surround kind of a lot of the situation. And I

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1 don't remember every detail of it now, but I
2 certainly remember a few things.

3 And, you know, I -- so if you ask me
4 to speculate as to, you know, why you didn't receive
5 a White House job, that would be my speculation.

6 Again, I have no firsthand knowledge.

7 Q Articles you're referencing in your answer
8 just now, you mean articles from December 2016?

9 A I have -- I would have no idea on dates.
10 It's not something I pay attention to.

11 Q It's articles -- let me ask this then,
12 it's articles about the pregnancy and the
13 involvement with Miller?

14 MS. HABBA: Objection to form.

15 THE WITNESS: No. I never said that. I
16 just think there was a lot of -- there were a
17 lot of -- there's a bunch of negativity that I
18 remember out there surrounding certain actions,
19 certain things.

20 And -- and again, I have no firsthand
21 knowledge on any decision the White House made,
22 but if you ask me to speculate, my speculation
23 would be, I remember a lot of less than savory
24 Tweets. I remember -- I remember certain
25 instances where there was a lot of bad

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1 headlines associated with, you know, partying
2 in Vegas and -- and other things. I believe
3 a -- a strip club came into one of them.

4 I just remember a lot of controversy that
5 kind of surrounded, you know, a bunch of
6 different topics.

7 And again, you're asking me to be
8 specific. I have no firsthand knowledge. I
9 just -- you know, I personally sat there and I
10 remember it. And it pains me a little bit to
11 say that because, again, I have a lot of -- I
12 have a lot of mutual respect for you. But if
13 you want an answer and you wanted me to
14 speculate, that's probably my speculation.

15 BY MS. DELGADO:

16 Q You mentioned an article about, quote,
17 partying in Vegas. I'm happy to bring up an article
18 to refresh your memory, but I believe, and please
19 correct me if I'm wrong, is the article you're
20 referring to the one about the Trump Campaign
21 advisers going to a strip club in Vegas the night
22 before the Clinton versus Trump final debate?

23 MS. HABBA: Objection to form.

24 THE WITNESS: I don't remember that level
25 of specificity. I think I'm just speaking in

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1 generalities right now, AJ.

2 BY MS. DELGADO:

3 Q Do you recall more than one article about
4 partying in Vegas?

5 A Again, I'm just totally speaking in -- in
6 generalities. I -- I would not be a position to
7 where I was counting articles of how kind of, you
8 know -- certain things that were either embarrassing
9 or, you know, didn't reflect well, I -- you know,
10 that's not my job. I was not over there.

11 But I just -- I remember that in the
12 back of my head. So if you asked me to speculate as
13 to why something did or did not happen, that would
14 be my speculation.

15 Q Do you recall Jason Miller mentioned in
16 that article about partying in Vegas?

17 MS. HABBA: Again, I'm just going to
18 object. He -- he did say he was speculating.
19 He didn't refer to a specific article.

20 It's mischaracterizing the witness's
21 testimony.

22 MS. DELGADO: He referred to articles
23 about partying in Vegas. That was his exact
24 quote. And he said article, so let me
25 rephrase.

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1 BY MS. DELGADO:

2 Q Did you read any article about Jason
3 Miller partying in Vegas?

4 A I certainly think Jason's name was
5 mentioned, yes.

6 Q Okay. Was Jason Miller appointed White
7 House communications director?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: I don't know. You need to
10 ask Jason.

11 BY MS. DELGADO:

12 Q Do you recall Jason Miller being appointed
13 or reading that Jason Miller has been appointed
14 White House communications director subsequent to
15 the partying in Vegas article or articles?

16 MS. HABBA: Objection to form.

17 A I think I remember Jason resigning. And
18 then did he later on take a role of some sort? I
19 think -- I think he did, yes. In some -- in some
20 way, shape or form. I'm not sure what that role
21 was, but I -- I remember Jason resigning at some
22 point and -- but I don't exactly know where he fit
23 into that apparatus off the top of my head right
24 now, AJ.

25 It's just been too long ago. It

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1 wasn't -- certainly wouldn't have been my focus.

2 BY MS. DELGADO:

3 Q So would it be accurate to say -- and I'm
4 happy to bring up the article about Jason Miller's
5 appointment date to refresh your memory. I'm going
6 to try to keep things moving, per your request, more
7 efficiently.

8 Would it be accurate to say Jason
9 Miller was appointed White House communications
10 director despite the article about partying in
11 Vegas?

12 MR. BLUMETTI: Objection to form.

13 THE WITNESS: AJ, if you tell me he was,
14 I'd certainly take your word for it. Again, I
15 don't track every single title of every single
16 White House officer. There's a lot of them
17 and -- and a lot of people came and went.

18 I didn't work in the administration, so I
19 take your word for it. If he was, he was.
20 But, you know, you can ask him and he could
21 confirm that for you.

22 BY MS. DELGADO:

23 Q Do you recall Jessica Ditto also listed as
24 an adviser in the article or articles you mentioned
25 about partying in Vegas?

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1 A Sitting here today, I don't really
2 remember that name so...

3 Q Do you recall reading that Jessica Ditto
4 was appointed deputy com director for the White
5 House roughly two months after that article? Does
6 that ring a bell?

7 A Well, clearly it doesn't if I don't really
8 recognize that name sitting here today. I mean, I'm
9 sure Jessica is a person I came across at some
10 point, but I just don't -- I don't remember her
11 sitting here.

12 Q Okay. You mentioned unsavory Tweets.
13 What are you referring to there?

14 A I just -- I remember it seemed like
15 every -- every day there would just be a flurry of
16 Tweets. And I don't remember the exact context of
17 all of them, but I remember there was a point that,
18 you know -- you know, I think your Twitter was just,
19 you know, almost becoming, you know, distracting for
20 lack of a better term.

21 It's just, you know, things being
22 sent at all hours and -- you know, I think -- you
23 know, I remember -- I remember that, you know.
24 Again, very vaguely, but I think there was a lot
25 of -- a lot of things that were sent and done that,

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1 you know, might not have been in direct alignment
2 with -- with obviously, you know -- you know, with
3 maybe the image of -- of -- or individuals, you
4 know, working in a certain orbit.

5 Q Would you say a woman complaining that
6 she's pregnant by her supervisor is not in line with
7 your father's image?

8 MS. HABBA: Objection.

9 MR. BLUMETTI: Objection to form.

10 THE WITNESS: AJ, I'm not saying that at
11 all. I'm just saying that there was a lot of
12 crazy stuff that was -- that was being sent all
13 around the place. And I don't have those
14 Tweets now, and I don't care to look back at
15 them. This isn't my lawsuit, and I'm not
16 really involved.

17 And so I just remember tangentially a lot
18 of just, you know, kind of craziness that was
19 being sent back on forth. And so I just have
20 that in the back of my mind.

21 BY MS. DELGADO:

22 Q Do you personally believe it's unsavory
23 for a pregnant employee to publically state that
24 she's pregnant by her supervise?

25 MS. HABBA: Objection.

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1 MR. BLUMETTI: Objection.

2 THE WITNESS: AJ, that's not at all what
3 I'm saying. I'm simply saying that there
4 was -- seemed to be a lot of manic Tweets on a
5 lot of fronts. Forgot about edges, a lot of
6 fronts. And I just remember that tangentially
7 in the back of my head.

8 BY MS. DELGADO:

9 Q And I want to make sure I heard you
10 correctly. Did you say the Tweets appear to be
11 manic, M-A-N-I-C?

12 A I remember flurries of -- of Tweets, yes.
13 And so, again, this isn't something I've gone back
14 and looked at, but I just have this impression in
15 the back of my head right now where it's -- you
16 asked me for causation, and I'm speculating again
17 because I was not the person who made that job. And
18 it, again, pains me to say that because I've always
19 thought highly of you, but it's just -- you know,
20 that's certainly what I remember in the back of my
21 head.

22 Q When you say "a flurry," in your
23 recollection how many Tweets do you recall there
24 being when you use the term flurry?

25 A AJ, I would have no idea how many Tweets

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1 there were.

2 Q Do you recall it being a few, many, less
3 than a dozen, more than a dozen?

4 MS. HABBA: Objection. Form.

5 You can answer if you understand.

6 THE WITNESS: Yeah, I remember it being,
7 you know, many, many, many. And, again, I can
8 go back and look, it's just what I have in the
9 back of my head. I have no firsthand knowledge
10 of why, I just remember flurries of -- of
11 Tweets, nonstop on lots of different subjects.

12 BY MS. DELGADO:

13 Q I'm going to take you back to 2015.

14 Would you agree that I was an early
15 Trump supporter?

16 MR. BLUMETTI: Objection to form.

17 BY MS. DELGADO:

18 Q I'll rephrase it.

19 Was I what you consider an early
20 supporter of your father's candidacy?

21 A Yes.

22 Q Do you recall -- and I'm happy to throw it
23 up on the screen but again trying to keep things
24 moving. Do you recall an article I wrote in praise
25 of your father being the nominee in October of 2015?

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1 A No.

2 Q Okay. Would you like me to show that?

3 MS. HABBA: Objection. Form.

4 THE WITNESS: Not particularly. I mean, I
5 don't remember the article. And I -- I have no
6 reason to doubt you were, AJ. I'm sure you
7 wrote a beautiful article so...

8 BY MS. DELGADO:

9 Q Do you recall many other pundits or
10 writers or activists at the time in 2015 advocating
11 for your father?

12 A A small handful.

13 Q Can you name any of them?

14 A I'm just saying there was a -- there was a
15 small handful. I wouldn't say it was a huge handful
16 in 2015 because I'm not even sure if he had
17 announced his candidacy at that point. But, you
18 know, there was -- if you told me you wrote an
19 article in support, I'd say you were among -- among
20 the first if it was 2015.

21 Q I'm going to show, if I can, let's see how
22 I manage this. I'm going to show you another
23 article. Hopefully this works. Bear with me.

24 Okay. I'm going to try to share this
25 screen.

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1 Okay. Are you able to see that in
2 the other -- there's another Zoom window that's my
3 computer which is also under Delgado.

4 Are you able to see that, Eric?

5 A Yes, I see that.

6 Q Okay. And the headline -- it's a Village
7 Voice article and the headline is, "Why Donald
8 Trump's Best Defenders are Woman" by Meave
9 Gallagher, October 18, 2016; is that correct?

10 A I see the article that you have up on the
11 screen.

12 Q Okay. Great.

13 I'm scrolling down to the paragraph
14 that begins, "Delgado has been" -- and I'm just
15 going to read that into the record and then ask you
16 about it. Let me see if I can get it here. Okay.
17 Better.

18 This is a quote from the article.
19 Quote, Delgado had been a vocal Trump advocate for
20 at least a year and joined Trump's team as a senior
21 adviser last month earning a special spot in his
22 campaign. In contrast to working-class whites who
23 have buoyed Trump's candidacy from the start,
24 Delgado's a first-generation Cuban-American woman
25 who bears many of the marks of the cosmopolitan

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1 elite -- like her law degree from Harvard and
2 oft-mentioned dogs she rescues from shelters -- that
3 her inclusion is meant to court. *Smart successful*
4 *Latinas love Donald Trump! He can't possibly be*
5 *that bad*, unquote.

6 Do you agree with that sentiment?

7 A I certainly like rescue dogs. I have one
8 at home. So yes, I agree with the -- AJ, I don't
9 know, it's an article from the Village Voice. Do I
10 agree with it? Do I agree that women were a great
11 voice for my father? My wife, who I think you have
12 a lot of respect for, included, absolutely. A lot
13 of -- a lot of women were incredible voices for my
14 father. No doubt you were, I'm sure, at the
15 beginning of the campaign as well.

16 Q Great. And I'm sorry, that -- I can
17 appraise that better.

18 Do you agree with that particular
19 paragraph about me and the value it says I brought
20 to your father's campaign?

21 A AJ, I don't know. I mean, I don't -- I
22 don't know how to rate value the somebody brings to
23 a campaign. I -- you know, it's -- you know, I
24 appreciate the fact that the Village Voice wrote a
25 nice article about you.

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1 Q So your answer is you don't know if you
2 agree with it?

3 A AJ, I'm not saying that. I'm not going to
4 parse through every word of a -- of a paragraph to
5 see whether or not I agree. I mean, I'm sure you
6 were a wonderful voice, and you know I've always had
7 a really nice relationship with you when -- you
8 know, you and I -- again, I'm just not going to -- I
9 don't know how to rate somebody's -- you know, I
10 just don't know how to rate somebody as they pertain
11 to the Voice that they have for a specific campaign.
12 I'm not going to do that.

13 Q Okay. I don't want you to feel like I'm
14 asking you to rate me. Let's keep it simple then.

15 Do you agree I brought value to your
16 father's campaign?

17 MS. HABBA: Objection. Asked and answered
18 many different times.

19 THE WITNESS: AJ, you were a positive
20 voice for -- for my father -- yeah, at least in
21 the beginning.

22 BY MS. DELGADO:

23 Q Would you agree that I was particularly
24 valuable as a Latina, given the comments your father
25 had made about the Hispanic immigration topics?

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1 MS. HABBA: Objection. Again, do you
2 mean -- just form and also asked and answered.

3 But are you asking in his opinion or what
4 in particular are you asking for? If you can
5 just re-ask it?

6 MS. DELGADO: I'm sorry, you have an echo.
7 Can you say that again?

8 MS. HABBA: Is it his opinion? You asking
9 for his father's opinion or the campaign's
10 opinion?

11 MS. DELGADO: I never mentioned his
12 father. I said would "you," he.

13 THE WITNESS: AJ, I don't know. I don't
14 know who's a positive voice. I don't know
15 who's a negative voice. I don't know.

16 I think that's -- I don't know. I'm not
17 here to speculate on who was positive, who was
18 negative. You know, but I don't know.

19 BY MS. DELGADO:

20 Q To be sure I'm not asking you to
21 speculate. Just do you feel I was a positive voice
22 or a valuable voice, I should say, I think was my
23 question. Did I bring value of the campaign --

24 (Simultaneous speakers)

25

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1 BY MS. DELGADO:

2 Q -- as a Latina?

3 A Well, I mean, first of all you need to
4 narrow that down to a time period because I think
5 your voice certainly changed. But AJ, I just don't
6 know.

7 Q Fair enough.

8 I mean, during the campaign, during
9 the 2015, 2016 election. I should have made that
10 clear.

11 A Yeah. AJ, I'm always very thankful for
12 somebody who goes out and fights for something I
13 believe in. And I think you were doing that at the
14 time so, you know, I thank you for that.

15 You know, I don't know -- again, I
16 just don't know how to rate the value of somebody's
17 voice from, you know, what is that, nine years ago
18 today. So I'm just not going to speculate.

19 BY MS. DELGADO:

20 Q You knew who I was during the campaign; is
21 that correct?

22 A Yeah, at some point in the campaign you
23 and I became acquaintances.

24 Q Okay.

25 (Exhibit 1 was marked for

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1 identification)

2 BY MS. DELGADO:

3 Q Are you able to see that photo?

4 A I am not, AJ.

5 Q It says my screen sharing is paused.

6 MS. DELGADO: Are you able to see it?

7 MS. HABBA: No. I cannot.

8 STENOGRAPHER: We still see the article
9 you first had up on the screen.

10 BY MS. DELGADO:

11 Q We will come back to that.

12 What I was going to show you were
13 photos of us on election night, Eric.

14 You recall my being in the war room
15 with you when -- do you recall me taking pictures
16 with you and Lara and your family?

17 A AJ, I have no doubt you were -- you
18 were -- you were certainly -- you were certainly
19 there.

20 Q Okay. What conversations have you had
21 with your father about me?

22 MR. BLUMETTI: Objection to form.

23 THE WITNESS: None.

24 BY MS. DELGADO:

25 Q Do you recall telling me in November of

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1 2018 -- November of 2017, I'm sorry, that your
2 father was very happy, at your Thanksgiving family
3 dinner, that I was joining the PAC?

4 A I'm so sorry, I think -- I thought you
5 meant meaning recently. Within the last, you know,
6 several years, certainly none. I -- I do not
7 remember saying that, but it -- it -- is that
8 possible? It's possible.

9 I'm not sure if I -- you know, is it
10 possible? Yeah, I didn't do a whole lot of work
11 with the PAC if really any, so I'm not sure how that
12 conversation really would have come up, but anything
13 is really possible these days, AJ.

14 Q Okay. So we were speaking about
15 conversations you've had with your father.

16 Do you recall any from the 2016, 2018
17 time period about me?

18 A As I sit here now, I -- I don't, AJ. It's
19 been -- it's been a lot of years since, you know --
20 it's -- as I said, this wasn't -- certainly wouldn't
21 have been my, you know, focus.

22 Q Okay. When did you find out that I was
23 pregnant?

24 A AJ, I have no idea. I'm sure at some
25 point, you told you. I think we had kids around the

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1 same general time. I had my son Luke, and I
2 remember your son's name because you used to send me
3 pictures, and I used to send you pictures of my son
4 Luke. And I think it's one of kind of the -- the
5 things that formed our bond or friendship or, you
6 know, however you'd refer to it.

7 Q So it was only after I had my son that you
8 were aware I was pregnant, I had been pregnant?

9 A I'm not saying that, AJ. I just -- I'm
10 not sure if I -- if I focus on every person that I
11 don't know all that well. You know, I think our
12 relationship probably really developed in that time
13 period.

14 Did I know you were pregnant? I'm
15 sure I could either know or see or -- that -- that
16 you were pregnant. But I just -- sitting here
17 today, I have no idea when I found out that you were
18 pregnant.

19 Q Do you recall your father having, whether
20 you personally witnessed or heard about it, any
21 reaction to the Tweets you mentioned earlier?

22 A Be more specific and then I -- when you
23 say, the Tweets I referred to earlier, can you be
24 more specific? I mean, you sent thousands of
25 Tweets. No different than me or anybody else,

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1 right, people send thousands of Tweets. When I'm
2 referring to Tweets I'm referring to general
3 collection. Right.

4 I'm not sure what you're trying to
5 say, but I have zero recollection of my father
6 having any reaction. Again, you certainly were not
7 a source of conversation between my father and I
8 that I remember sitting here today.

9 It's just -- it wasn't really what I
10 was doing. Anything's possible AJ, I'm not -- I'm
11 not saying -- but...

12 Q If I were to show you an e-mail from a
13 reporter that states that after your father learned
14 of the pregnancy he wanted Miller and I both out,
15 would that refresh your memory?

16 MR. BLUMETTI: Objection to form.

17 BY MS. DELGADO:

18 Q I'll just show the e-mail. I'll withdraw
19 the question and just show the e-mail.

20 Are you familiar with Josh Dawsey,
21 Eric, Washington Post reporter Josh Dawsey?

22 A I've heard the name.

23 Q Okay, Eric. Are you able to see that?

24 A I see an e-mail from People Politico.

25 Q Perfect, that's it.

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1 A Of which I'm not on.

2 Q Correct.

3 A Yeah -- yes, I see that.

4 Q Okay. Thank you.

5 MS. DELGADO: So I'm going to admit this
6 as Exhibit 2.

7 (Exhibit 2 was marked for
8 identification)

9 BY MS. DELGADO:

10 Q This is an e-mail from Josh Dawsey who, at
11 the time, was at Politico.

12 And I want to quote you to the area
13 I've highlighted for you, and I'm going to quote
14 from it, quote, Trump became aware of the issue.
15 Trump was not happy, didn't want either of them
16 brought on, Jason Miller or AJ, unquote.

17 Does that help ring a bell to
18 anything you heard from your father.

19 MS. HABBA: Excuse me. Sorry, AJ, I just
20 have to object. I don't know how authentic
21 this is. Obviously, he wasn't on this e-mail.
22 He's not a recipient. It wasn't directed to
23 him. It doesn't appear that you are either.
24 Josh Dawsey's not here, but if Eric wants to
25 opine on it, feel free.

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1 MS. DELGADO: Yep. We're not admitting
2 this as -- as evidence, it's just something to
3 refresh his recollection. Your objection is
4 noted.

5 MS. HABBA: Well --

6 THE WITNESS: None of this refreshes any
7 recollection.

8 BY MS. DELGADO:

9 Q Okay.

10 Let me share my screen. Bear with
11 me. Let's -- here we go.

12 Do you know of any steps that anyone,
13 be it your father, anyone at the campaign or anyone
14 at all took regarding my potential White House job?

15 MR. BLUMETTI: Objection. Asked and
16 answered.

17 THE WITNESS: AJ, I do not.

18 BY MS. DELGADO:

19 Q Okay. Do you know of any steps anyone, be
20 it your father, anyone at that campaign, or anyone
21 at all took to speak to me about the pregnancy?

22 A AJ, I feel like I'm a broken record. I
23 don't. I wasn't involved in that capacity in that
24 apparatus, nor would this have been my focus. It
25 would be like me asking you about a golf course I

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1 was building in Scotland. It's just not something I
2 would focus on. The answer is no.

3 Q Well, you hear of someone who you
4 respected, as you said earlier, being pregnant --
5 becoming pregnant, excuse me, on your father's
6 campaign.

7 That is not something you would have
8 taken interest in?

9 MS. HABBA: Objection. Form.

10 BY MS. DELGADO:

11 Q Is that -- I'll rephrase it.

12 Is that something you would take an
13 interest in?

14 A You know, AJ, I run a company that has
15 thousands of thousands of employees. You know,
16 we're surrounded by a very big group. I don't know
17 when you and I developed, you know, a friendship. I
18 don't remember if it was then. I think it was,
19 again, a little bit later on. I certainly --
20 obviously, we were cordial. I just -- I'm sure I
21 thought it was wonderful, and there's nothing that I
22 value more in life than kids as somebody who has two
23 young ones of my own. I just sitting here today
24 don't remember the circumstance of which a pregnancy
25 of a person in an apparatus that I wasn't

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1 controlling, I just -- I'm sorry, I just don't
2 remember.

3 Q At what point did you hear, if any, that I
4 was not going into the White House?

5 A I have no idea, AJ.

6 Q Do you remember anyone from the national
7 campaign, and I mean 2015, 2016 campaign, who wanted
8 a White House job and did not go into the White
9 House?

10 A Yeah. Yeah, plenty. One comes to mind,
11 Michael McKenna.

12 Q Anyone else?

13 A I'm sure there were many people who wanted
14 to be part of the -- the White House that did not
15 go. I'm sure there was plenty.

16 Q What is the policy at your organization if
17 an employee becomes pregnant -- are you aware of
18 your policy on that?

19 MS. HABBA: Objection.

20 THE WITNESS: We've got great maternity
21 leave programs, so on and so forth, yes. In
22 fact, I have quite a few pregnant people in the
23 company right now. It's a beautiful thing.

24 BY MS. DELGADO:

25 Q What is your policy at the Trump

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1 Organization if a supervisor has a sexual
2 involvement with a subordinate?

3 MS. HABBA: Objection.

4 MR. BLUMETTI: Relevance.

5 MS. HABBA: Yeah, how is this relevant?

6 BY MS. DELGADO:

7 Q You can answer.

8 MS. DELGADO: Are you lodging any
9 relevance objections?

10 MS. HABBA: Yes, I said objection.

11 THE WITNESS: Yeah. AJ, I don't know off
12 the top of my head. I would have you ask
13 somebody in HR.

14 BY MS. DELGADO:

15 Q Let's see.

16 In early -- remember it's earlier our
17 friendship developed. In early October 2017, do you
18 recall you and I meeting in your office?

19 A I remember you were in my -- I remember
20 you came up to, yeah, our office floor I think one
21 time, maybe two.

22 Q What was the purpose of that meeting?

23 A AJ, I don't remember at this point.

24 Q You produced some documents yesterday that
25 were messages and an e-mail from you, which

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1 immediately proceeded that meeting. Would it help
2 if I brought those up?

3 A Yeah, you could. I -- I didn't put a
4 whole lot of time into reading through all my old
5 stuff.

6 Q Okay. We'll circle back to that. Let's
7 see. Let me try and find that one and then share
8 the screen again.

9 Okay. Share screen again.

10 Okay. Eric, let me know that you can
11 see that?

12 A Yes, I see that.

13 Q Okay. So this is -- I'll make this
14 Exhibit 3. This is an e-mail from September 22,
15 2017, from you to me.

16 (Exhibit 3 was marked for
17 identification.)

18 BY MS. DELGADO:

19 Q And now do you recall us meeting shortly
20 thereafter?

21 A Yes. This is in line with what I just
22 said.

23 Q Okay. Thank you. I'm going to show
24 another one.

25 You produced this same -- you

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1 produced this same text exchange yesterday yourself.

2 MS. HABBA: We did, yes. He might not be
3 aware.

4 BY MS. DELGADO:

5 Q Okay. Are you able to see it, Eric?

6 A Very cute baby.

7 Q Thank you. He was small back then. He's
8 very big now.

9 October 12th you write, "I'm so glad
10 we got to connect, AJ. Let's touch base tomorrow or
11 over the weekend."

12 And then October 16th you write, "I
13 got some insight into the thing we spoke about on
14 that lunch, but I'll call you later. Hope the
15 little man is good."

16 And I respond, "Sure thing."

17 So it seems we met -- would it be
18 accurate to say, Eric, that we met sometime, it
19 seems like October 12, October 11?

20 A I -- I don't know. I mean, that sounds
21 like it would be somewhere around there. That is
22 when we had -- yes.

23 Q And now your recollection has been a
24 little bit refreshed, what was the purpose of that
25 meeting? Why did I come to your office?

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1 A I'm not sure if I remember, you know, at
2 this point. I think there was -- I think there was
3 some level of dispute. And I think you reached out
4 to talk, right, that was the first e-mail that you
5 showed me a second ago. And I said I'd be happy to
6 sit down with you because obviously you and I had
7 some level of -- of relationship. But I'm -- that's
8 all I can conjure at this point.

9 Q Fair enough.

10 Do you recall at that meeting your --
11 I don't want to put words in your mouth, so do you
12 recall at that meeting we discussed my prospective
13 lawsuit against the campaign?

14 MR. BLUMETTI: Objection to form.

15 BY MS. DELGADO:

16 Q I'll rephrase.

17 Do you recall at that meeting our
18 discussing a potential lawsuit about which the
19 campaign had been notified?

20 A AJ, honestly I don't remember a whole lot
21 about that meeting. It's -- it's very possible.
22 You know, maybe even probable. But I just don't
23 remember much about that meeting, to tell you the
24 truth.

25

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1 Q Do you recall your suggesting that instead
2 of the lawsuit I take a job with the pack or the
3 campaign?

4 MR. BLUMETTI: Objection to form.

5 THE WITNESS: No, I don't remember
6 suggesting that.

7 BY MS. DELGADO:

8 Q Do you remember reaching out to Brad
9 Parscale about facilitating a job for me at the
10 pack?

11 A I do. I remember introducing you to Brad.
12 I remember you were really, it sounded light down
13 on -- on, you know, yourself and circumstances and
14 life. And I remember obviously going back and forth
15 with you with pictures of our kids. And, you know,
16 it -- I felt like you were hurting. And I knew Brad
17 fairly well. Brad, you know, worked for us for, you
18 know, a long time back in Trump world, being
19 pre-politics.

20 And I -- I definitely remember
21 suggesting that you speak to Brad and even probably
22 making that introduction to Brad to see if there was
23 a fit, you know, with the political organization he
24 was working with at the time. But that's really all
25 I remember.

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1 Q He was working for the PAC at the time
2 he -- American First PAC; is that correct?

3 A I believe so, yes.

4 Q Okay. When you said you introduced me to
5 Brad, you're saying it was an introduction or did
6 you reach out to Brad about a job?

7 MS. HABBA: Objection to form.

8 MR. BLUMETTI: Objection to form.

9 MS. DELGADO: I'll rephrase that.

10 BY MS. DELGADO:

11 Q When you say "an introduction," what do
12 you mean by an introduction?

13 A I remember you at some point, I think it's
14 in the text messages that we produced, but said
15 something along the lines of how you were
16 struggling, how you needed a job. And, you know, I
17 knew Brad. And obviously, you were in the political
18 sphere, and it's not really the world I work in, but
19 I -- I said AJ, why don't you -- why don't you speak
20 to Brad, maybe there's an opportunity, you know,
21 over there.

22 And I connected you. And, you know,
23 I think you took it from there. And you, I think,
24 got the job. And, you know, the rest is -- you
25 know, the rest, I wouldn't -- I wouldn't know.

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1 At this point I wasn't working for
2 the PAC. I never really had much interaction with
3 the PAC. But I just remember making the
4 introduction to Brad and suggesting that when you
5 were telling me that you had -- you know, you needed
6 employment.

7 Q Were you aware that I already knew Brad?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: I don't -- I don't know
10 whether you did or not. I knew Brad, and it
11 was a suggestion that I made because I know he
12 was a person who was well connected in the
13 political world, and I thought he might be able
14 to -- to help you in some way, shape, or form.

15 BY MS. DELGADO:

16 Q So when you say you made an introduction,
17 do you mean a communication to both of us linking us
18 up?

19 A AJ, I don't remember how I linked you up.
20 I remember, as I said before, you were down on luck
21 or telling me that you really needed a job. And --
22 and I suggested you reaching out to Brad because
23 he's probably the person in the political sphere
24 that I knew the best. And I believe you guys talked
25 about employment at the PAC that he was associated

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1 with. I don't even know how -- I don't know what he
2 was doing with the PAC at the time. And I think you
3 ended up working there.

4 And, you know, I'm glad that I was,
5 you know -- I'm able to help -- help you in that
6 role, make that connection. But that's really
7 all -- all I remember. I was trying to help out a
8 single mother with a young child who came to me, who
9 I had had respect for, by linking that person up
10 with another person I had respect for. And those
11 two individuals took it from there, and I went back
12 to my day job, which is real estate.

13 BY MS. DELGADO:

14 Q Did you ask Brad to give me a job?

15 A No. I made the connection with Brad. I'm
16 not going to ask anybody in any organization that
17 I'm not affiliated with to -- to give somebody a
18 job. That's not my decision to make. That would be
19 like, you know, you asking me to give somebody a job
20 at the Trump Organization, an organization that you
21 have nothing to do with. But I made the connection
22 and, you know, you clearly did something right. You
23 guys hit it off and you got the job.

24 Q Is there -- and I didn't see it in the
25 documents produced, and I certainly don't have it,

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1 is there any documentation that what you were doing
2 was an introduction of two individuals?

3 A I don't know because again, as I said, I
4 didn't focus a whole lot on it. I just remember
5 very clearly that I suggested to you. I think there
6 was a moment where you were -- I think I could see
7 the sadness in your eyes. And again, the -- you
8 know, I'm just the guy who was trying to help a
9 person I consider -- considered, consider, you know,
10 however you want to, you know, refer to it.

11 Obviously, I think this is the first
12 time we've ever met in this kind of context, AJ. I
13 think you've always had mutual respect for me and
14 I've always had a lot of mutual respect for you.

15 But, you know, it was -- it was my
16 attempt to try and help somebody who certainly felt
17 like needed help at that point. And I made the
18 introduction and, you know, you took it from there
19 with Brad. And -- and I was proud to see that it
20 worked out.

21 Q Were you aware that at the time we met the
22 Trump Campaign, three months earlier in July of
23 2017, had filed an arbitration suit against me for
24 \$1.5 million?

25 A It's possible. I don't think I could link

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1 up that timing this many years later on something
2 that I was not all that involved in. I mean,
3 clearly I was involved to a certain extent, you and
4 I met, I -- I just wouldn't be able to put the
5 timing together sitting here today.

6 Q In our meeting in your office in October
7 2017, do you recall discussing, in fact it's
8 referenced in our Twitter messages prior, do you
9 recall discussing the mediation with the Trump
10 Campaign and the settlement?

11 MR. BLUMETTI: Objection. Form.

12 THE WITNESS: AJ --

13 (Simultaneous speakers)

14 MS. DELGADO: I'll rephrase.

15 BY MS. DELGADO:

16 Q Do you recall discussing anything about a
17 lawsuit of mine against the campaign?

18 MS. HABBA: Just a warning not to divulge
19 anything that would be privileged.

20 THE WITNESS: AJ, it's very possible.

21 And -- and I'm sure we discussed it. I mean,
22 clearly you were showing me -- you were showing
23 me pictures of your son. And I -- clearly you
24 were telling me the circumstances of -- of your
25 life so I'm sure that's -- that's possible

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1 that, you know, a lawsuit was -- was discussed.

2 I imagine you certainly told me about
3 that. I mean, yes. I would imagine you would
4 have told me about a lawsuit that you were
5 considering or that you filed or something
6 along those lines. I think that's when I
7 became involved with, frankly, this.

8 BY MS. DELGADO:

9 Q Right. I believe that's what you
10 referenced in the e-mail I showed earlier, the
11 September e-mail where you said I was represented by
12 counsel; is that correct? Would that be correct to
13 say? The counsel we're referring to is the counsel
14 who was representing me in the potential lawsuit
15 against the campaign; would that be correct?

16 MS. HABBA: Objection. Form.

17 THE WITNESS: It's very possible. I mean,
18 I would assume that's correct. I just don't
19 know sitting here right now.

20 BY MS. DELGADO:

21 Q Do you recall telling me during that
22 meeting that if I went forward with the lawsuit that
23 we -- which I don't pretend to know what "we"
24 referenced, we would embroil you in years of
25 litigation; do you recall that?

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1 MR. BLUMETTI: Objection.

2 THE WITNESS: AJ, that's, first of all,
3 something I don't think I would say. And
4 second of all, I -- I don't think that was
5 probably the basis of our conversation, which I
6 think was super friendly taking about kids and
7 talking about life. It's -- that doesn't sound
8 like me.

9 BY MS. DELGADO:

10 Q Were you trying to convince me to drop the
11 lawsuit in exchange for a job with the PAC or the
12 campaign?

13 MR. BLUMETTI: Objection. Form.

14 THE WITNESS: No. AJ, I really don't
15 believe I was.

16 BY MS. DELGADO:

17 Q So you were just meeting with me -- it's
18 your testimony here today that you were just meeting
19 with me to do a good deed towards a single mother?

20 A Listen, I think I get roped into a lot of
21 things but, you know, you, and I had a nice
22 relationship. I obviously, knew Larry Rosen who was
23 handling, you know, this case and -- and obviously,
24 you reached out in that e-mail that you showed me
25 here. And, you know, if I can -- if I can help

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1 people, if I can help resolve things, I like to try
2 and do that.

3 So, I mean, I think that was the
4 general context of -- of that meeting. And, I mean,
5 I think I was successful. I mean, I tried to be a
6 good friend to you and I think I was a good friend
7 to you. And, you know, one of the messages I saw
8 briefly as I was reading through, it was actually
9 you thanking me for -- for caring and listening,
10 having a shoulder. And I think you were super
11 appreciative of that at that time.

12 It's actually frankly, a little
13 disappointing to sit here now as a person who really
14 tried, including later on. I mean, I remember there
15 was one time where you wanted to go to the White
16 House Christmas party and, you know, didn't get an
17 invitation. You called me and you were super upset.
18 And I think I gave you one of my personal, you know,
19 family invites so you could bring William.

20 I mean, I -- AJ, I worked hard to
21 really try -- I tried to do the right thing by you.
22 I tried to do the right thing but, you know, a
23 person who I could clearly tell was -- was, you know
24 hurting. You know, I tried to be a good friend to
25 you.

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1 Q Speaking of that White House Christmas
2 invite, Eric, do you recall what led to that was
3 that Jason Miller was constantly photographed at the
4 White House, and I brought that to your attention?

5 A That's probably right, AJ. I think -- I
6 think that's probably the basis for which you were
7 upset that, you know, Jason had attended one. And
8 obviously, he was, you know, big in the political
9 scenes in Washington, D.C. And -- and that's why I
10 think I gave you one of, if I remember correctly --
11 again, I have to go back and job my memory because I
12 haven't thought about this in years. I think Lara
13 and I invited you as our personal guest. I think
14 you were super appreciative of that.

15 I remember you giving me a hug and
16 telling me how much that meant to you. And so I
17 tried in a lot of ways, AJ, to be a -- a good
18 friend. And then -- you and I didn't know each
19 other that well, but I -- I -- you know, I like
20 trying to do the right thing.

21 Q I want to show you an e-mail, Eric. It's
22 an e-mail stream, and I'm going to share the screen
23 again. Hoping it works.

24 That's not it. Hang on.

25 Okay. Let me know if you're able to

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1 see this.

2 Can everyone see it?

3 MS. HABBA: Yeah.

4 MS. DELGADO: Okay. Thank you.

5 BY MS. DELGADO:

6 Q Okay Eric, this is an e-mail from you
7 dated January 23, 2018. If you want to take a
8 moment to read it over. It's to Larry Rosen.

9 Who is Larry Rosen?

10 A Larry Rosen was an attorney.

11 Q From whom?

12 A I don't know what parties Larry
13 represented at this point.

14 Q Well, why were you e-mailing him?

15 A I think because you obviously brought
16 something to my attention. I mean, look at that
17 first line. "Hi Larry, I have cc'd AJ. Neither of
18 us realized this was still ongoing."

19 I don't even know what I'm referring
20 to now. That might have been the lawsuit.

21 "AJ indicated the same." Why don't
22 you -- or I guess AAA, I just reading this for the
23 first time, "Why don't you pull together all
24 necessary paperwork necessary to dismiss the AAA."

25 I think -- AJ, you can tell me if

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1 this is correct. Wasn't there an arbitration filed
2 against you, and I was trying to help it get
3 dismissed clearly?

4 Q I'm sorry, your question -- is that what
5 this e-mail shows?

6 A I mean, I think reading this, that's what
7 it said. "Neither of us," referring to you and I,
8 "realized this was still ongoing. Why don't you
9 pull together the necessary paperwork necessary to
10 dismiss AAA." Which was the -- I think it's he
11 arbitration against you.

12 So -- what do you need? I think I
13 was trying to -- to, you know, help facilitate
14 something that would have been positive for -- for
15 you.

16 Q When you -- when you said something that
17 would have been positive for me, you referenced a
18 signed letter or a waiver. What do you mean by
19 that?

20 A I don't know sitting here today, AJ.

21 Q Weren't you referring to a waiver, meaning
22 I release the campaign from claims I have against
23 it?

24 MR. BLUMETTI: Objection to form.

25 MS. DELGADO: Let me rephrase.

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1 BY MS. DELGADO:

2 Q When you write, What do they mean, just a
3 signed letter/waiver from both of us?

4 Does letter slash waiver mean a
5 waiver of claims by AJ Delgado?

6 A I don't know AJ. I mean, that's very
7 possible. Most of the time when you release a
8 lawsuit you -- you do mutual releases. Right. I
9 mean that's pretty typical in the legal world. But,
10 you know, this is from, what, 2017, 2018. I just
11 don't remember at this point.

12 Q Mr. Rosen replies, I've scrolled up. And
13 confirms that, "Yes, Eric, you're correct. And
14 there is still a pending AAA arbitration that the
15 Trump Campaign filed."

16 A Well, AJ, I think you're making my point.
17 Clearly if he's telling us there is an -- yes.
18 There is still an active arbitration. That kind of
19 eludes to how little I knew about this because
20 clearly I didn't know much about the arbitration.
21 It's consistent with the first sentence of the last
22 e-mail, if you scroll down where it's you and I --
23 AJ and I didn't know anything about this. Neither
24 of us realized it was still ongoing.

25 So I -- I think it probably shows my

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1 lack of knowledge and involvement in that situation.

2 Q Eric, aren't you speaking for me in that
3 e-mail when say "Neither of us realized this was
4 still ongoing"?

5 A Clearly, I'm saying that neither of us
6 realized this was still ongoing. Yes.

7 Q What was your basis for thinking that
8 neither of us realized this was still ongoing?

9 A I have no idea sitting here today.

10 Q Okay. And I respond, and if you'd like to
11 take a minute to read it, please do, so that I don't
12 unfairly characterize it. But please read it and
13 let me know if my description that I respond
14 politely declining to release the campaign of claims
15 is correct?

16 MR. BLUMETTI: Objection to form.

17 MS. DELGADO: I'll rephrase it.

18 BY MS. DELGADO:

19 Q Eric, take a minute to read it, please.

20 A I got it.

21 Q Great. Thank you.

22 Scroll down.

23 A Yep, no, I have the whole thing. I
24 understand.

25 Q Okay.

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1 A I have a sense of this e-mail.

2 Q Is it correct to say I'm declining to
3 release the campaign?

4 A I don't know. That's a great question
5 for -- for you. What's interesting to me is the
6 first sentence if you scroll up please, "I'm
7 replying to you directly, as I prefer not to
8 communicate with Mr. Rosen directly."

9 You obviously sought my friendship
10 here. You and I had a nice relationship. And you
11 didn't want to communicate with the person who was
12 handling the matter so you asked me to help. I
13 mean, you know, AJ, it's a great example of no good
14 deed in this world goes unpunished. I mean, here I
15 am sitting through a deposition because you reached
16 out to me for help.

17 Q That's not an answer to my question. Can
18 I rephrase or resubmit the question then?

19 The question was: Is it a correct
20 characterization of my e-mail that I am declining to
21 sign a release?

22 MS. HABBA: Objection to form.

23 (Technical interruption.)

24 MS. HABBA: Can you just rephrase the
25 question?

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1 MS. DELGADO: Sure.

2 BY MS. DELGADO:

3 Q Eric, in the e-mail am I declining to sign
4 a release?

5 A AJ, I'm not going to interpret your
6 e-mails. Your e-mails say whatever they say. I
7 don't -- it's -- I mean, it -- you know, somebody
8 else can interpret your e-mails. It's just -- it's
9 not -- it's not my job to sit here and read what
10 your words meant to -- to you or try and decipher
11 this message to me.

12 Q I'm going to show you the offer letter I
13 received from the PAC. This is a new share.

14 STENOGRAPHER: Did you want to mark that
15 e-mail --

16 MS. DELGADO: I think we are on 3 or 4.

17 STENOGRAPHER: Let me double check. I.

18 STENOGRAPHER: Think I might have
19 skipped --

20 MS. DELGADO: Okay.

21 MS. HABBA: I don't think she admitted the
22 last exhibit into evidence, if it was supposed
23 to be admitted.

24 STENOGRAPHER: This -- this will be 4.

25 MS. DELGADO: The one prior should have

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1 been the text exchange.

2 STENOGRAPHER: Do you want to make that
3 one 4 and this one 5?

4 MS. DELGADO: Let's make that 4. Then 5
5 would be the e-mail exchange, which is a 3-part
6 e-mail.

7 (Exhibit 4 was marked for
8 identification)

9 (Exhibit 5 was marked for
10 identification)

11 (Exhibit 6 was marked for
12 identification)

13 BY MS. DELGADO:

14 Q And then the most recent would be this
15 one, which I believe I'm going to share now.

16 Okay. Are you able to see an America
17 First policies letter?

18 A I see, yes.

19 Q If you scroll down to the second
20 photograph do you see the start date is January
21 1st, 2018?

22 A Yes, I do.

23 Q So going back to the exhibit we just
24 discussed. You e-mailed me about putting together
25 the necessary paperwork for a signed letter waiver

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1 on January 23, 2018; is that correct?

2 A Excuse me. Can you rephrase that.

3 Q Yes. I'm sorry.

4 Going back to the e-mail we were
5 discussing now where you e-mailed Larry Rosen and
6 copied me, is it correct that the date on that is
7 January 23, 2018?

8 MR. BLUMETTI: Objection. The document
9 speaks for itself.

10 THE WITNESS: Yeah, if you tell me it is,
11 I don't know. I don't have it in front of me.

12 BY MS. DELGADO:

13 Q So is it correct to say that three weeks
14 after my America First policies start date, you
15 contacted me about signing a release of the
16 campaign?

17 MR. BLUMETTI: Objection to form.

18 THE WITNESS: I think that e-mail actually
19 very clearly showed that you contacted me, not
20 the opposite way around. The -- the e-mail was
21 very clear that you contacted me.

22 (Simultaneous speakers)

23 THE WITNESS: And I -- I specifically
24 said, I did not want to reach out to you, even
25 despite our friendship, because you were

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1 represented by counsel. And then the second
2 e-mail you specifically wrote, "I don't want to
3 speak to Larry Rosen because he filed an
4 arbitration against me, which is why I'm
5 contacting you directly."

6 AJ, let's be very clear, I never reached
7 out to you. You reached out to me. And from
8 the last two e-mails that you sent, it shows
9 that you reached out to me twice.

10 BY MS. DELGADO:

11 Q Eric, I understand your position. I don't
12 understand where -- I understand what you're saying.
13 I don't see where the documents reflect what you're
14 saying. I'm trying to make sure I understand you.

15 Is it your position that the
16 January 23, 2018, e-mail that you sent to Larry
17 Rosen and copied me, that I have reached out to you?

18 MS. HABBA: Asked and answered.

19 Objection.

20 THE WITNESS: Go back and look at the
21 first two e-mails that we went through in this
22 deposition. In both cases, you had reached out
23 to me, not vice versa.

24 BY MS. DELGADO:

25 Q Which two e-mails are you referring to?

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1 A The first one where clearly you asked for
2 a meeting and I said I wasn't -- I did want to call
3 you because you were represented by counsel. I did
4 not want to reach out because you were represented
5 by counsel. I was explaining why I didn't reach
6 out.

7 And, you know, obviously, the second
8 one where you e-mailed me and say that you didn't
9 want to speak to the person directly handling the
10 matter personally, and that's the reason you were
11 reaching out to me directly. That's the last e-mail
12 you showed me.

13 Q Right. That's a reply all to the e-mail
14 stream you initiated; correct? And I'm merely
15 removing Mr. Rosen from the reply that you
16 initiated?

17 MS. HABBA: Objection. I think it's a
18 mischaracterization. Can we just agree that
19 the exhibits say -- that exhibits say that --
20 his testimony is clear, and it's been asked and
21 answered several times.

22 MS. DELGADO: I'm just trying to make sure
23 there is a document he's recalling or something
24 he's seen that I'm not aware of on the screen.

25 THE WITNESS: AJ, I'm just simply reading

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1 the words from -- from the e-mails you showed
2 me before. But how can I answer your question
3 as it pertains to this document?

4 BY MS. DELGADO:

5 Q The question I believe, which is still
6 unanswered, and the court reporter can correct me if
7 you did answer it is: Is it correct that three
8 weeks after my start date with the PAC you sent me
9 an e-mail about signing a waiver?

10 A I don't know how the dates line up. I --
11 I would not know that sitting here today.

12 Q There on your screen, if you'd like to
13 take a minute, I can share that America First letter
14 again.

15 MS. HABBA: But we can only see the
16 America First letter. I think you're speaking
17 about the prior exhibit, so you would have to
18 pull that.

19 BY MS. DELGADO:

20 Q Okay. The America First letter, Eric,
21 is -- and again, I think this is already asked and
22 answered, but just to help them along, if you're
23 able to see the America First letter the start date
24 is January 1st; correct?

25 A I don't know because it's --

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1 January 1st, 2018, yes.

2 Q Correct. Okay. And then I'm going to do
3 a resume share of the earlier exhibit. Hopefully
4 that -- this works.

5 A AJ, the dates speak for themselves.
6 Whatever the dates are, they are. I'm not in a
7 position sitting at my desk having no context to any
8 of this, not having been involved in most of this to
9 try and line up dates for something that happened
10 seven years ago.

11 So the dates --

12 (Simultaneous speakers)

13 BY MS. DELGADO:

14 Q And you have no communication -- I'm
15 sorry. Go ahead.

16 A The dates are what they are.

17 Q Correct. Exit.

18 Did you have -- were you
19 disappointed, Eric, that I didn't sign the release?

20 MR. BLUMETTI: Objection to form.

21 THE WITNESS: I don't even remember what
22 this release is at this point, AJ. I mean, I
23 could go back and maybe try to cobble it
24 together, but I have no idea if I was
25 disappointed, if I was happy.

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1 I mean, there it seems like the
2 introduction I made to Brad got you a job where
3 you were making \$15,000 a month. That's --
4 that's awfully good. You know, you should --
5 you should have been proud of that.

6 But I have no idea about these releases.
7 And it's interesting that you were -- I would
8 think that an ordinary person would ask you to
9 sign a release before you started employment,
10 not after you started employment, but I don't
11 know, maybe that's just conventional business
12 thinking.

13 BY MS. DELGADO:

14 Q Sorry. The release was against the
15 campaign, and I started working for the PAC. Are
16 you aware of that?

17 A I'm -- I'm aware that you started working
18 for the PAC, yes.

19 Q Why then do you say I should have
20 addressed signing a release of the campaign's
21 liability or potential liability before starting
22 with the PAC?

23 A No. I think before in your last question,
24 you were trying to link the two together. And I --
25 I just -- I'm not seeing how something you did, you

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1 started an employment subsequent has anything to do
2 with something that was asked for later. But
3 that's -- I think where you were trying to go where
4 that question. I just wasn't understanding it.

5 Q Do you understand that after I started
6 working for the PAC I was asked to release the
7 campaign from liability?

8 A Well, based on an e-mail, and I'd actually
9 appreciate it if you pulled it back up, it seems to
10 suggest that there was an active arbitration
11 ongoing.

12 Q Right.

13 A Right.

14 Q Against the campaign.

15 A Against the campaign of which neither of
16 us realized still existed; correct? Isn't that what
17 it said?

18 Q It says that you speak for me there. That
19 is what it says. That is what you wrote. Correct?

20 A I certainly didn't realize it was ongoing
21 because I said neither of us, but if I'm just
22 speaking for myself, I didn't realize it was
23 ongoing. And clearly Larry asked then ordered to
24 release a lawsuit that he was involved in that -- or
25 maybe even spearheading a man that you wouldn't talk

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1 to, which is the reason you came to me, he asked for
2 mutual releases, which I think is what any lawyer,
3 including yourself, would -- would do when you --
4 when you release parties from -- from suit. I mean,
5 that seems completely logical.

6 Q Eric, isn't it true that you waited until
7 I had started my job with the PAC to ask me to
8 release the campaign of my potential or existing
9 claims against it?

10 MR. BLUMETTI: Objection to form.

11 THE WITNESS: It's not true, and that's
12 exactly contrary to what the e-mails suggest
13 there. The e-mail right there says that I
14 didn't even know about the -- the suit.

15 I mean, that's crystal clear from the
16 first line of that text.

17 BY MS. DELGADO:

18 Q Well, that's what you write but is that,
19 in fact, what you knew?

20 A AJ, this is just pure silliness. Yes.
21 That's in fact what I knew. I really tried to help
22 make an introduction that landed you a job that was
23 paying you \$15,000 a month. And I'm proud of that.
24 And you were super happy with the new form of
25 employment.

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1 You came to me because apparently
2 there was some kind of arbitration or something
3 against you. And I tried to resolve that, as well,
4 as a friend. And here I am being deposed for it.
5 It's -- it's actually wrong, but...

6 Q So it's correct to say that I declined to
7 sign the release; is that your understanding?

8 MS. HABBA: Objection. Asked and
9 answered.

10 Move forward, please.

11 MS. DELGADO: I was jut trying to bring it
12 back. He did already answer --

13 (Simultaneous speakers)

14 THE WITNESS: AJ, AJ, I have no idea what
15 you signed and what you didn't sign. Just,
16 yeah.

17 BY MS. DELGADO:

18 Q I sent you an e-mail stating that I would
19 not sign a release, which is the exhibit that we
20 just looked at; correct?

21 A And I have no idea what happened in the --
22 in the aftermath. I just don't know, I wasn't
23 involved.

24 Q Did you send any written communication
25 after that expressing that you were disappointed

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1 that I had not signed the release?

2 A AJ, I have no idea.

3 Q Okay. We can come back to that because
4 the sharing the screen is slowing things down.

5 MS. HABBA: Objection. We provided you
6 production --

7 MS. DELGADO: Sorry?

8 MS. HABBA: We provided you production
9 based on the terms you asked so you have a full
10 production.

11 MS. DELGADO: I'm sorry, you what?
12 There's such an echo.

13 MS. HABBA: You received production for
14 any documents that we went through that you
15 requested so you have anything that would have
16 been related to the search terms, et cetera,
17 that you asked for.

18 I'm not sure why you would ask Eric that
19 question. The attorneys gave you the
20 production yesterday. But let's move it along.

21 (Simultaneous speakers)

22 MS. DELGADO: I don't understand what the
23 objection is?

24 MS. HABBA: He already acknowledged that
25 we gave him -- you the production yesterday.

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1 Look at the production.

2 MS. DELGADO: Irrelevant what was -- I'm
3 not asking what's in the production. I'm
4 asking him did he send any written
5 communication to me stating he was disappointed
6 that I had not signed the release?

7 MS. HABBA: That would be part of the
8 production.

9 MS. DELGADO: I'm not asking you to answer
10 for him. You're answering for him. I'm asking
11 him. I'm not asking about the production --

12 (Simultaneous speakers)

13 BY MS. DELGADO:

14 Q I'm asking him if he said that.

15 Eric, do you have an answer?

16 A I think I already answered. I -- I don't
17 remember every e-mail that went back and forth
18 between us, AJ. Respectfully, this was probably the
19 least important thing I was doing on a given day. I
20 was trying to help -- I was trying to help a friend
21 and clearly that backfired.

22 Q Were you trying to help me or were you
23 trying to help your father's campaign?

24 A AJ, I was -- I was clearly trying to --
25 you know, I was trying to help you solve something.

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1 When I saw the pain in your eyes, I was trying to --
2 I tried to make an introduction to somebody who was
3 a, you know, friend of mine but I have no direct
4 affiliation with -- you know, I ended up getting you
5 a job. I'm proud of that.

6 You expressed how happy you were.
7 You expressed how that helped you get back on your
8 feet. That made me feel good inside. And then you
9 came to me to try to help you resolve apparently --
10 and again, I'm really just seeing this in
11 arbitration that was filed against you because you
12 wouldn't speak to the parties that were handling it
13 directly, so you asked me to get involved. And --
14 and I, once again, tried to help.

15 That was generally my role.

16 Q Okay. Would you -- is it accurate to say
17 that you and Brad Parscale had a very good
18 relationship?

19 A I knew Brad -- I knew Brad well, yes.

20 Q In fact, Brad had come into the Trump
21 Campaign due to his work with you on designing
22 websites for the Trump Organization; correct?

23 A It's why I felt comfortable reaching out
24 to him and -- and putting you in touch with him
25 directly when you expressed to me that you

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1 desperately needed a job, yes.

2 Q So if you told Brad, Hey, give AJ a job or
3 words to that effect, is it safe to say Brad would
4 do so?

5 A No one would do that AJ, you know. If my
6 closest friend would say hey, give X, Y and Z a job
7 at the Trump Organization, and unless that person,
8 you know, really impressed me in some way, shape or
9 form or could add a lot of value, I -- I wouldn't do
10 it.

11 I made the introduction, and you got
12 the job on your own. And after I made the
13 introduction, I'm not sure if I even ever had
14 anything do with it again.

15 Q I want to show you a -- I'm gong to try to
16 share the screen, we'll come back if I can't. I
17 want to show you a termination letter which was just
18 an e-mail. Let me -- I shouldn't call it a letter.

19 This is -- and please, Eric, let me
20 know if you can't see that.

21 MS. DELGADO: Or Jared and Ms. Habba, let
22 me know.

23 MS. HABBA: I got it.

24 BY MS. DELGADO:

25 Q Okay. This is a termination letter or

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1 e-mail that I received on April 27, 2018. I'll give
2 you a minute to read it. At 6:00 p.m., Friday. And
3 as you can see it's from Brian Walsh who was not
4 running the PAC. I'll give you a second to read it.

5 A I got it. I can read it.

6 Q Okay. So is -- is it correct to say it
7 doesn't give a reason for the termination other than
8 it's not working out and we are moving in another
9 direction?

10 A I mean, it -- scroll down.

11 Q Sure. Yeah, there's -- in the first
12 paragraph, I should rephrase that.

13 A Keep -- yeah, I don't know. I'm not going
14 to try and, AJ, decipher a -- an outside
15 organization's employment letters to their employees
16 terminating them or I -- that's not my job. You
17 could ask whoever's on this is that -- is that -- is
18 Brad -- whoever's on here, you can ask them that
19 question. But I -- I don't know how to decipher
20 somebody else's letter.

21 Q Fair enough.

22 Given the date, which I'm informing
23 you is April 27, would you say that's a little over
24 90 days after the e-mail you sent me asking to sign
25 the release and my declining to sign the release?

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1 A I mean, it seems like it was 90 days after
2 whatever that release is. Sure.

3 Q Were you, at the time, aware or did anyone
4 inform you that certain states' laws establish a
5 presumption of retaliation when it's 90 days or less
6 that an employee is terminated after making a
7 complaint?

8 MR. BLUMETTI: Objection to form. Calls
9 for a legal conclusion.

10 BY MS. DELGADO:

11 Q I'm just asking what you're aware of.

12 A AJ, I'm not aware of really much of this
13 at all.

14 Q So your position is that it was -- it was
15 a coincidence, or do you have any position?

16 MR. BLUMETTI: Objection.

17 THE WITNESS: AJ, I do not --

18 BY MS. DELGADO:

19 Q Huh?

20 A America First fired you. You'd have to
21 ask them that question. I run a real estate
22 company. I have no idea.

23 Q Correct, Eric. But it was you who
24 e-mailed me asking me to sign a release. That's why
25 this question is being posed to you. Because 99

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1 days, so just over that 90-day magic marker period
2 that I declined your request, I was suddenly fired
3 from America First. That's why the question is
4 being posed to you.

5 MS. HABBA: Objection.

6 BY MS. DELGADO:

7 Q So your position is --

8 MS. DELGADO: Was there an objection?

9 MS. HABBA: Yeah, that's not a question.
10 It's argumentative.

11 MS. DELGADO: I'm explaining to him why
12 it's being asked of him.

13 MS. HABBA: Please, just ask the question.

14 BY MS. DELGADO:

15 Q Is it your position that it was a
16 coincidence that I was terminated just over 90 days
17 after you asked me to sign a release and I declined?

18 MR. BLUMETTI: Objection to form.

19 THE WITNESS: AJ, I do not know why you
20 were fired from America First. Believe me, I'm
21 not the type of person who wants to introduce
22 two people only to see them get fired 90 days
23 later.

24 You know, frankly, it's a stain on -- on
25 me. You know, if you want to ask why you were

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1 fired from the job, ask Brian or somebody who
2 knows the first thing about America First
3 policies because I certainly don't.

4 BY MS. DELGADO:

5 Q Given our text messages, which you
6 produced right after my firing, wouldn't you have
7 inquired what the reason was?

8 MS. HABBA: Objection to form.

9 THE WITNESS: Why would I inquire? AJ,
10 it's none of my damn business. Why would I ask
11 you, AJ, can you please tell me why you were
12 fired? This is -- this -- it doesn't sound
13 like something I would do. Maybe you shared
14 that on your own, but I wasn't involved in the
15 PAC.

16 BY MS. DELGADO:

17 Q I think you understood my question to mean
18 you would have inquired of me. Let me pose it again
19 differently.

20 Would you have inquired of anyone in
21 the know, be it at the PAC or Brad, why I was fired?

22 A I don't believe I ever did, AJ.

23 Q Okay. But your privilege log shows that
24 you were contacting an attorney when you and I were
25 texting about my being fired?

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1 MS. HABBA: Objection. Privilege.

2 BY MS. DELGADO:

3 Q I'm not asking for content of the
4 communications.

5 MS. HABBA: What is the question?

6 (Simultaneous speakers)

7 THE WITNESS: I contact attorneys all the
8 time. What -- what are you -- I'm not sure. I
9 mean, half my job is working with attorneys on
10 real estate and other things.

11 What are you referring to? I have no
12 idea, AJ.

13 BY MS. DELGADO:

14 Q I'll bring up the privilege log.

15 (Exhibit 7 was marked for
16 identification)

17 BY MS. DELGADO:

18 Q Okay. I'm going to share the privilege
19 log you produced yesterday or your -- your attorney
20 produced.

21 Eric, if you're able to see -- if you
22 look, you are contacting Larry Rosen about me,
23 otherwise it would not be on this privilege log,
24 with the subject line, "This work?"

25 MS. HABBA: Again, what's the question,

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1 whether he did it?

2 MS. DELGADO: Yes. Sure. Let's start
3 there. Sure.

4 MS. HABBA: This is -- I'm just going to
5 state a general objection. The reason there is
6 a privilege log is because my client is not to
7 testify or be asked about the priveledged
8 communications.

9 And I'm going to direct him not to answer.
10 Let's move on.

11 MS. DELGADO: Oh, no, I'm not asking him
12 what was discussed or the content of
13 communications. I'm certainly allowed to ask
14 him about what's on the privilege log. The log
15 itself is not privileged.

16 MS. HABBA: What rule is that?

17 BY MS. DELGADO:

18 Q So the question was: Were you
19 communicating with your attorney? Obviously, do not
20 tell me what the content of that communication was,
21 but were you communicating with an attorney, as
22 stated on your privilege log on April 30th, 2018?

23 A AJ, I have no idea who I was communicating
24 with on April 1st of 2018.

25 Q It's April 30th, if you look at your

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1 screen?

2 A April 30th; I have no idea.

3 MS. HABBA: I'm happy to stipulate that
4 the privilege log speaks for itself.

5 BY MS. DELGADO:

6 Q Who is Larry Rosen?

7 Again, I believe I asked you earlier,
8 but I'm not sure if you answered.

9 A Larry Rosen's an attorney.

10 Q Who is he the attorney for?

11 MS. HABBA: Objection.

12 THE WITNESS: AJ, I have no idea as it
13 pertains to you. Larry has had many
14 representations over the years.

15 BY MS. DELGADO:

16 Q Was he your attorney?

17 MS. HABBA: I'm going to object to this.

18 AJ, if it's priveleged, that means that
19 there was a capacity as an attorney for Mr.
20 Trump. There is -- Larry Rosen, as is
21 publically filed, was a representative of the
22 Trump Organization and several people through
23 his tenure with -- and still, frankly, so it's
24 not relatable to this case. Even if it is,
25 it's priveleged. We've mark it priveleged

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1 because it is priveledged.

2 If you have a question about the privilege
3 log, we can address it outside of the
4 deposition.

5 MS. DELGADO: Actually, this brings up an
6 issue. Your privilege log is incorrect. Under
7 the rules for this privilege log, I believe
8 it's the Southern Direct of New York rules,
9 you're supposed to list, if it's readily
10 apparent on the document, the relationship
11 and/or capacity of the attorney listed. To
12 exactly avoid this situation where as an
13 attorney your privilege log fails to specify
14 whose attorney is he.

15 That's just an e-mail address. Is that an
16 attorney? Whose attorney was he? The
17 privilege log by the rules needed to state
18 that.

19 I'm trying to ask that now.

20 MS. HABBA: Okay. So that's an attorney
21 question that you and I can handle outside of
22 this deposition. As you see there was
23 privilege -- this is the standard form that
24 we've used in many cases. This is not our
25 first rodeo. The privilege states that it's an

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1 attorney/client communication, attorney work
2 product.

3 Clearly, there was an attorney/client
4 communication, which advised that Mr Rosen did
5 have that relationship, which is why it's
6 privileged. If you'd like to make an objection
7 to our discovery, I'm happy to do so outside of
8 this deposition, but I recommend with the
9 witness here that you use your time wisely and
10 ask him direct questions about things he can
11 testify to.

12 Anything on this privilege log other than
13 stipulating that it reflects an accurate
14 depiction of privilege communications, he's not
15 going to know what those communications are.
16 He -- he didn't go through those
17 communications.

18 I'm happy to stipulate to those but they
19 are privileged so I recommend we move on. If
20 you have anything you want to address outside
21 of it, AJ, I'm happy to do so.

22 MS. DELGADO: Okay. Respectfully, the
23 fact that it's not your first rodeo is not
24 particularly relevant. There are may
25 situations where, and this is quite common,

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1 attorneys repeatedly violate the rules as far
2 as privilege logs. This is not the first time
3 I've seen an inadequate privilege log.

4 I'm permitted to ask Mr. Trump, sitting
5 here today, who Larry Rosen is and if Larry
6 Rosen was his attorney. I'm not permitted to
7 ask him to tell me about the conversations he
8 had with Mr. Rosen. I am permitted to ask him,
9 and I do expect him to answer, who Larry
10 Rosen's attorney was. Was he a client of Larry
11 Rosen?

12 MS. HABBA: I have no problem with that
13 question.

14 Go ahead.

15 THE WITNESS: Yeah, absolutely. Larry
16 represented me and various entities on many
17 different things.

18 BY MS. DELGADO:

19 Q Okay. One second.

20 Forgive me if this was already asked
21 and answered. So you agree you consulted an
22 attorney, but don't tell me what you spoke to him
23 about. Obviously, you agree you consulted an
24 attorney around -- about my text messages or my --

25 (Simultaneous speakers)

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1 MS. HABBA: Objection. That's privileged.

2 THE WITNESS: AJ, I have no idea.

3 MS. HABBA: No. Don't answer that
4 question. Sorry. Don't answer that question.
5 It's privileged.

6 MS. DELGADO: Well, it speaks for itself.
7 You can leave it.

8 Not his answer, the privilege log speaks
9 for itself. We'll leave it at that.

10 BY MS. DELGADO:

11 Q Was there any personal animosity towards
12 me from you, your brother, your father or anyone
13 else you can think of because I wouldn't sign the
14 release?

15 A I made an introduction to get you a job.
16 I don't think there's personal animosity. In fact,
17 I think I was trying to help.

18 Q But the job was so that I wouldn't pursue
19 claims against the campaign, wasn't it?

20 MR. BLUMETTI: Objection to form.

21 THE WITNESS: Absolutely untrue.

22 BY MS. DELGADO:

23 Q Isn't this similar to what Lara did with
24 Omarosa? It was a 15,000 a year job in exchange
25 for, quote, keeping everything amicable?

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1 A I know nothing about Omarosa, other than I
2 was on The Apprentice with her, but --

3 Q Do you remember the -- go ahead.

4 A It's simply not the case.

5 Q Do you remember the news reports of
6 Omarosa's recorded calls in which she alleges that
7 your offered her a \$15,000 a year job in exchange
8 for keeping things amicable. Do you recall that?

9 A AJ, not off the top of my head I don't,
10 truly.

11 Q Okay.

12 A I don't focus on Omarosa, and I should
13 have never focused on -- on this one and helping
14 you.

15 Q Were you spoken of -- or did you hear
16 anything about my seeking a job with the campaign in
17 the summer of 2019? Does that ring a bell?

18 MR. BLUMETTI: Objection to form.

19 THE WITNESS: Sitting here today --

20 (Simultaneous speakers)

21 BY MS. DELGADO:

22 Q Do you have -- let me rephrase it and then
23 you answer. Thanks, Eric.

24 Do you have any recollection or did
25 you hear anything about my seeking a job with the

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1 campaign in the summer of 2019?

2 A Sitting here today, I don't remember.

3 Q Okay.

4 (Sotto Voce Discussion.)

5 BY MS. DELGADO:

6 Q Okay. Eric, going back to what you said
7 about unsavory statements or communications or acts,
8 you used the word "unsavory," why does your father
9 keep Jason Miller in the campaign?

10 MR. BLUMETTI: Objection to form.

11 BY MS. DELGADO:

12 Q If you know. I'll rephrase it.

13 Eric, do you know why, given your
14 statement earlier about unsavory communications or
15 actions, do you know why your father keeps Jason
16 Miller employed in the campaign?

17 MR. BLUMETTI: Objection to form.

18 THE WITNESS: I think I -- it's pretty
19 clear that I'm not actively involved with the
20 day-to-day management of the campaign.

21 BY MS. DELGADO:

22 Q Have you ever expressed an opinion to your
23 father or to anyone about Jason Miller working in
24 the campaign?

25 A AJ, I don't express too many opinions on

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1 things that I'm not actively involved with on a
2 day-to-day basis. No, that I can remember.

3 Q Do you recall Jason Miller in the
4 2015/2016 election referring to your father as,
5 quote, sleezy Donald.

6 A I do not, AJ. It's probably one of the
7 reasons I try to stay away from politics, aside from
8 being a great surrogate for the man I love dearly.

9 Q Let me go -- I'm going to share the screen
10 again.

11 This is an excerpt that was filed in
12 another case. And I'd like -- it's only ten pages
13 and it's rather large font.

14 MS. HABBA: Sorry, what case is this?

15 BY MS. DELGADO:

16 Q This is -- you know, I can even make it
17 easier for you. Let me make it easier for you.
18 I'll throw up the Mediaite article instead because
19 it's a much better summary. Move things along
20 faster.

21 Okay. I'll do this. This is fast.

22 Share screen.

23 Okay. Eric, are able to see this?

24 (Exhibit 8 was marked for
25 identification)

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1 A I see what it says.

2 BY MS. DELGADO:

3 Q Okay. Do you recall that article in the
4 summer of 2019?

5 A I do not AJ.

6 Q Okay. Do you have any opinion given that
7 headline as to Jason Miller working for your
8 father's campaign?

9 A AJ, I have many opinions that I keep to
10 myself. It's not my job here to give my opinions on
11 things that I'm not intimately involved in.

12 Q Do you consider this action or actions by
13 Mr. Miller, would you describe those as unsavory?

14 A It -- is it unsavory? It's --

15 (Simultaneous speakers)

16 BY MS. DELGADO:

17 Q I'm sorry?

18 A AJ, I -- I don't know. I'm not -- I'm
19 not -- you know. Who wrote this? Who wrote this?

20 Q Yes, it's an article on Mediaite, and it's
21 summarizing deposition transcripts that were filed
22 into a public docket in a separate case. I was not
23 a party to that case.

24 A I trust about two percent of the media --

25 Q I -- would you like to see the deposition

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1 transcript? I was just trying to be faster.

2 A Not really. I trust you, AJ. I'm just
3 not going to speculate on something I know nothing
4 about. I'm sorry, it's --

5 Q So can you answer the question if you
6 consider this --

7 A I think I just said, I'm not going to
8 speculate on something I -- I know nothing about. I
9 mean, I see headlines and the article -- the
10 headline and article's not great, but I'm just not
11 going to speculate to something I know nothing
12 about. This is the first time I'm seeing this.

13 Q Okay. I don't want you to have to
14 speculate, so do you want me to show you the sworn
15 testimony where Miller admits to these things under
16 oath?

17 MS. HABBA: What's the question. Let's
18 just ask the question.

19 THE WITNESS: I'll take your word for it,
20 AJ. I just --

21 BY MS. DELGADO:

22 Q Okay. Do you consider hiring prostitutes
23 unsavory?

24 A I would consider hiring prostitutes less
25 than perfect, yes.

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1 Q Do you consider visiting Asian themed, not
2 my words, massage parlors for sexual acts to be
3 unsavory?

4 A It's never been my thing AJ, it's never
5 been my thing. So yes, I would -- it's not
6 something I would do but ...

7 Q Are you aware these are criminal acts?

8 A I have no idea.

9 Q Okay. You're not aware if hiring
10 prostitutes is criminal?

11 MS. HABBA: I'm going to object. Asks for
12 legal conclusion.

13 THE WITNESS: I guess it depends on where
14 you are, right? But I -- I just don't know.
15 AJ, I'm not speculating on this garbage. I
16 mean, you're going down a -- you know, you're
17 going down a -- I'm just not -- I'm not
18 speculating on this nonsense.

19 BY MS. DELGADO:

20 Q Does your father or does the campaign, and
21 or the campaign have a different standard for men
22 and women when it comes to considering things
23 unsavory?

24 MR. BLUMETTI: Objection to form.
25

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1 BY MS. DELGADO:

2 Q I'll go one-by-one.

3 Does your father's have a different
4 standard between men and women when it comes to
5 considering things to be unsavory?

6 A Well, considering we probably have more
7 female executives than any company in the country,
8 no. No, we don't so...

9 Q Do you have a different standard?

10 A Between men and women? No, I don't, AJ.

11 Q Is there anything about pregnancy in
12 particular that you feel should be kept silenced?

13 MR. BLUMETTI: Objection to form.

14 (Simultaneous speakers)

15 BY MS. DELGADO:

16 Q Is there anything about a woman being
17 pregnant that you feel should be withheld from the
18 public?

19 MR. BLUMETTI: Objection to form.

20 BY MS. DELGADO:

21 Q You can answer.

22 MS. HABBA: Can you rephrase?

23 Do you understand the question?

24 THE WITNESS: AJ, I think pregnancy is a
25 beautiful thing. I think it's a beyond

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1 beautiful thing. If we can have five more kids
2 tomorrow, I would. If I could adopt five more
3 kids I probably would, as well. I love
4 children. I think pregnancy is a beautiful
5 thing. I think life is a beautiful thing.
6 Nothing makes me happier than my kids.

7 So I think nothing should be withheld
8 about pregnancy, no.

9 BY MS. DELGADO:

10 Q What about Tweets about being pregnant?

11 MR. BLUMETTI: Objection to form.

12 THE WITNESS: I'm sure my wife put up a
13 thousand Tweets about being pregnant, and I'm
14 sure I did, as well. Nothing -- no.

15 BY MS. DELGADO:

16 Q Were you aware of Hope Hick's involvement
17 with Corey Lewandowski?

18 A No, I'm not. Not to the best of my
19 knowledge.

20 Q So your testimony today is that you had no
21 information or heard anything regarding Hope Hicks
22 involvement with Corey Lewandowski?

23 MS. HABBA: Just to clarify, do you
24 mean -- what timeframe do you mean?

25 MS. DELGADO: Sure. During the campaign,

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1 2015 and 2016.

2 THE WITNESS: I have no direct knowledge
3 of Corey and Hope having any kind of
4 relationship. A lot of speculation flies
5 around a lot of people, and believe me, you
6 certainly hear certain stories.

7 But no, I have no direct knowledge of that
8 taking place.

9 BY MS. DELGADO:

10 Q What about Bryan Lanza and Kelly Love?

11 A Who, Bryan Lanza and who?

12 Q I'm sorry, go ahead.

13 A Bryan Lanza and who?

14 Q Kelly Love, L-O-V-E?

15 A Names I haven't heard in years. I knew
16 both of them briefly. I'm not sure if today I could
17 pick them out of a lineup. I have no direct
18 knowledge of any kind of relationship between them.

19 Q Okay.

20 MS. DELGADO: I think we have about 45
21 minutes to go, so if everybody would like to
22 just take a ten minute or five-minute break.
23 We can get some water and use the bedroom.

24 (Recess.)

25

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1 (Exhibit 9 was marked for
2 identification)

3 BY MS. DELGADO:

4 Q Let's go to share screen again.

5 Okay. Eric, are you able to see the
6 text on the screen?

7 A Yes, I am.

8 Q Okay. Earlier I asked you whether you
9 were disappointed that I hadn't signed the release.
10 This is the text exchange that I was having trouble
11 bringing up. I believe this is part of your
12 production, as well. Its dated January 25, 2018.

13 Can you take a moment to read it.

14 A Yes, I can -- I read it.

15 Q Okay. And is it correct to say that you
16 state that you're disappointed that, quote, You
17 think it is productive to hold the threat of a
18 lawsuit over our heads for several years, unquote?

19 A Yes, I definitely said that.

20 Q Okay. As long as that one's marked, we
21 can move on.

22 Forgive me, I'm sure your attorney
23 will correct me if I have, if I already asked you,
24 when was the last time you spoke to Brad Parscale
25 about me or this matter, if at all?

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1 A I haven't spoken to Brad just in general
2 in -- in some time. I haven't done a good job
3 keeping up with him. And I don't think I've spoken
4 to him about you since I made the introduction.
5 That's the best of my knowledge sitting here today,
6 but I -- I haven't spoken to Brad in some time.

7 Q Okay.

8 A I mean, anything's possible, I just --
9 sitting here today it's -- not that I remember,
10 today.

11 Q Okay. Do you recall anyone -- I asked you
12 earlier if you recalled anyone from the campaign who
13 wanted a White House job and did not obtain one and
14 your answer was Michael Cohen. Do -- and then you
15 couldn't recall any others.

16 But I forgot to ask you, do you
17 recall anyone, if any, from the RNC who wanted a job
18 in the White House and did not get one?

19 A AJ, I mean, looking back there are people
20 jockeying for jobs in the White House all over the
21 place, and many of those people clearly didn't get
22 jobs. You asked me for specific names. I mean, I'm
23 sure I can think of some if I went back and really
24 kind of jogged my memory, but -- but there were a
25 lot of people jockeying to go into the administration

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1 and, you know, obviously, space is limited and a lot
2 of people did not get jobs in the administration.

3 Q Did you have any opinion on -- wait, let
4 me rephrase it.

5 By the way, when you say go back and
6 check, is there an e-mail, database or text messages
7 that you could check subsequent to this deposition?

8 A Probably --

9 Q To refresh your memory?

10 A Probably not. I guess, what I'm maybe
11 doing a poor job of saying is I remember a ton of
12 people jockeying to go into the White House. And many
13 of those people never made it there. They never
14 made it into the government. They never made it to
15 Washington, D.C. for a whole host of reasons.

16 And so, just because you worked in
17 the campaign didn't at all mean that you were going
18 to go down to Washington, D.C.

19 Q But sitting here today you can't recall a
20 specific person; is that correct?

21 A Well, I don't think Brad ever worked in
22 the administration. He was campaign manager, right?
23 Like -- I could be wrong, but I don't remember Brad
24 ever taking a role in the actual administration, yet
25 he was the head of the campaign. I mean, there were

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1 plenty of people.

2 Q I should be clear. I think my earlier
3 question, and perhaps I messed up and didn't make
4 that clear when I asked you now, was who wanted to
5 go into the White House. Not just who didn't, who
6 wanted to go into the White House. Brad did not
7 want --

8 A Certainly, Michael Cohen wanted to go into
9 the White House and -- and he didn't. And I'm sure
10 there were many others. I mean, if you want to
11 actually talk about the White House, there's --
12 there's got to be a ton of people because the White
13 House apparatus itself isn't that large. Government
14 is obviously large.

15 When I say "not that large," I mean
16 not enough for every person in the massive campaign
17 that's running in, you know, thousands and thousands
18 of people across swing states and other things. I
19 mean, you could never fit all of those people into,
20 you know, the west wing. It's just not possible.

21 Q Did you have any -- at a senior national
22 level though from the campaign, would you imagine
23 most of those went in?

24 A I -- I really don't know AJ, sitting here
25 today. I was not implementing personnel and hiring

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1 for, you know -- you know, at least on a grand level
2 for the White House. Maybe here and there, you
3 know, I thought somebody was nice and rendered an
4 opinion, but I just wasn't -- I just -- that wasn't
5 my job.

6 Q Do you recall how Lynne Patton who, I
7 believe, if I'm not mistaken was your wedding
8 planner, correct me if I'm wrong, got a job in the
9 Trump administration?

10 A Where did you read that, AJ?

11 Q That's coming to mind. Correct me if I'm
12 wrong.

13 MS. HABBA: Can you reask the question?

14 THE WITNESS: Lynne worked for me for --
15 in the company for many years. Charity -- a
16 wonderful person. Lynne ran a charity for sick
17 children for a bunch of years. She's a
18 wonderful person. When I hear people describe
19 her as my wedding planner, I actually take
20 offense to that. Frankly, you know, it's
21 borderline racist just to tell you the truth.

22 But Lynne -- Lynne is a wonderful person
23 and she -- yeah, she's a really wonderful
24 person.
25

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1 BY MS. DELGADO:

2 Q To be clear, Eric, I believe the reason
3 she's referred to as the wedding planner is to
4 establish the personal nexus or the personal
5 relationship you two have. I don't think there --
6 that any media report has used it to denigrate or
7 mean that her whole career consists of being your
8 wedding planner.

9 I think -- the way I've taken it when
10 I've read that is that's just to show her personal
11 closeness to you.

12 A I think -- I think it's pretty degrading
13 when she did a lot of -- a lot of great things. But
14 anyhow, it doesn't matter AJ. That's fine. So...

15 MS. HABBA: Let's just ask questions.

16 THE WITNESS: What's your question?

17 BY THE WITNESS:

18 Q Sure. The question had been, but I think
19 you segued -- you went off on a little bit of a
20 tangent there in your answer, if you recalled how it
21 is that Lynne Patton came to have a job in the Trump
22 White House. And I described her as your wedding
23 planner. And you asked, why is it you describe her
24 as the wedding planner and then described her -- so
25 I don't think you ever answered the question?

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1 A I don't know. Did she actually have a job
2 in the White House? I --

3 Q No, the administration. In the
4 administration. I'm sorry.

5 A You just said the White House and I don't
6 know --

7 (Simultaneous speakers)

8 BY MS. DELGADO:

9 Q Yeah, the first question I said the
10 administration. I'm sorry. My second question -- I
11 misspoke. When I reasked it, I misspoke. It's in
12 the Trump administration.

13 A Lynne became very involved in the campaign
14 subsequent to the RNC convention, which she spoke at
15 and did a beautiful job. I believe, and I'd have to
16 go back and look. And I -- she's one of a few
17 people I know this about, but I believe she took on
18 African-American outreach and coalitions and did
19 a -- again, a beautiful job.

20 She got very heavily involved in
21 politics after she decided, because of her love
22 of -- of me and my father and what I had done for
23 kids, to stand up on stage at the RNC and talk about
24 us as family and the impact we had made on her
25 lives. And I think that day changed her, and I

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1 think she wanted to make a difference. And I
2 believe she went into the administration and took on
3 urban housing in minority communities or, you know,
4 something along those lines.

5 But she was not, to the best of my
6 knowledge, part of the, quote, unquote, White House.
7 I think she was part of --

8 Q Correct.

9 A -- urban development for, I believe it was
10 New York State.

11 MS. DELGADO: I just want to share the
12 screen to mark this as an exhibit for the court
13 reporter.

14 (Exhibit 10 was marked for
15 identification)

16 MS. DELGADO: If you could mark that as
17 the next exhibit. It's just a New York Times
18 headline.

19 BY MS. DELGADO:

20 Q Great. I want to be clear as to where
21 I -- since you asked, Eric, where I got that idea to
22 refer to her, which is the same way the New York
23 Times did. That's all --

24 A I mean, let's just take one thing because
25 I just have to do this. First of all, I don't even

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1 know if New York housing was directly part of, I
2 want to say, again, part of the White House. It
3 just was not, and you kept on asking the White House
4 question. And again, I think it's degrading to call
5 her my wedding planner.

6 You know, I took all of three weeks
7 to plan my wedding and she worked for us for eight
8 years. So I just -- I think it's degrading of a
9 great woman by both the way you asked the question
10 and frankly the New York Times.

11 Q Sorry. Did you say the way I asked the
12 question was degrading?

13 A Yeah. At least how you stated who she was
14 as a person. If you define an entire person's life
15 and career as being my wedding planner, it wasn't
16 all that complicated to do because we did it in one
17 of our own properties. It's, I think, fairly
18 degrading of the person.

19 Q Okay. I think the exhibits speak for
20 itself that that's how she's referred to in the
21 press. I don't know anything about her. I haven't
22 researched her. Just going by what's in the public
23 domain.

24 Speaking of degrading to a woman of
25 color, were you aware that the White House job for

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1 which Jason Miller allotted me was as Hispanic media
2 director?

3 MR. BLUMETTI: Objection.

4 THE WITNESS: AJ, I have no damn idea what
5 job you were slotted for in the White House, if
6 you were even slotted for a job in the White
7 House. You can ask somebody who was actually
8 part of that apparatus, and I was not.

9 BY MS. DELGADO:

10 Q I was just asking if you were aware.

11 Would you consider it racist, since
12 you brought up that term a moment ago, to make the
13 one Latina adviser on the campaign the Hispanic
14 media director?

15 (Simultaneous speakers)

16 MS. HABBA: Objection to form.

17 THE WITNESS: AJ, I don't have an opinion
18 on any of this. I -- I didn't slate these
19 jobs. And by the way, I think you did Hispanic
20 outreach, so I think if you were doing Hispanic
21 outreach it might have made sense to slot you
22 into a job that did what you were already
23 doing.

24 I mean, that's how I look at it from a
25 corporate standpoint, but I don't render an

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1 opinion on -- on positions that were apparently
2 slated for people who didn't work in a -- it's
3 not my job to render that opinion.

4 BY MS. DELGADO:

5 Q Was your impression that most of what I
6 did was Hispanic media?

7 A AJ, I don't really have much of an
8 impression of what you did, other than be a nice
9 spokesperson at the -- at the beginning.

10 Q Just following up on what you just said
11 about it making sense, in your opinion, because I
12 did some Hispanic media work?

13 MS. HABBA: Is that a question?

14 THE WITNESS: I'm not sure if I'm
15 understanding your question. If you want to
16 rephrase it, then I'm happy to opine an answer.

17 BY MS. DELGADO:

18 Q Was it your impression that most of the
19 work I did was Hispanic media work?

20 A Well, I mean, I seem to remember, I think,
21 your Twitter description held you out as a Cuban
22 American surrogate for Donald J. Trump. Am I right
23 in saying that?

24 Q Correct. Probably right.

25 A Well, that would probably lend to my

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1 conclusion, but...

2 Q So should a black employee who -- whose
3 Twitter bio says Black Trump supporter be placed in
4 a White House job that entails Black outreach or
5 working with African-American media companies?

6 MR. BLUMETTI: Objection to form.

7 MS. HABBA: Objection.

8 MR. BLUMETTI: Objection. Relevance.

9 MS. HABBA: Relevance. I mean, so many
10 things. Now, we're in hypotheticals. He has
11 no knowledge of the campaign. He said that.

12 Let's just ask questions he has direct
13 knowledge of.

14 MS. DELGADO: He brought up the issue of
15 my role in the White House making sense to him.
16 He's made it relevant.

17 BY MS. DELGADO:

18 Q You can answer, Eric.

19 MS. HABBA: I repeat my objection.

20 THE WITNESS: What was the question, AJ?

21 MS. DELGADO: Can the court reporter read
22 back the question please?

23 *(Requested portion read back)*

24 THE WITNESS: Not necessarily, but if it's
25 where they thought that they were best utilized

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1 and where they could contribute the most to, I
2 could see it being highly possible.

3 BY MS. DELGADO:

4 Q Were there any other advisers you could
5 think of for the campaign that were Hispanic?

6 A I mean, we had tremendous Hispanic support
7 so I'm sure there were.

8 Q Can you think of any?

9 A We that a tremendous amount of pastors who
10 were Hispanic pastors. Pastor Maldonado out of
11 Miami, he was -- he was a great surrogate. He
12 worked directly for the campaign, maybe not, but he
13 was certainly a surrogate. There was a bunch of
14 great Hispanic leaders and advisers that were part
15 of the 2016 campaign, absolutely.

16 Q Were you aware that the person who did the
17 Hispanic media role at that RNC was not slotted into
18 a Hispanic role at the White House? Were you aware
19 of that?

20 A AJ, I would have no clue. I was not
21 focused on personnel decisions of the White House
22 for the 20th time.

23 Q Let's bring up the privilege log again.

24 Are you able to see that?

25 A Yes.

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1 Q Okay. Just going to ask you who some of
2 these individuals are.

3 Who is Lara@gilesparscale (phonetic)?

4 A Well, the person that says Lara Trump,
5 Lara@gilesparscale.com is probably Lara Trump.

6 Q That's your wife. Yes. Okay. Thank you.

7 So your wife was working for Brad's
8 company; is that correct?

9 A For a period of time my wife worked with
10 Brad, yes.

11 Q Okay. And Patrick McPartland, who is he?

12 A Who?

13 Q Patrick McPartland?

14 A I have no idea, but it looks like it's the
15 same e-mail as Larry Rosen, so I imagine he's an
16 associate of Larry Rosen's. I'm not sure if I know
17 Patrick directly. Maybe --

18 Q Alan Garten -- Garten is the general
19 counsel for Trump Organization; is that correct?

20 A Yes, it is.

21 Q Was he at that time?

22 A General counsel, yes.

23 Q I assume so. Okay. Let me see here. I'm
24 just scrolling through, get this out of the way now.

25 Who is Matthew Maron of Trump Org?

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1 A Matt Maron was an attorney.

2 Q An attorney at Trump Org. Yes. Okay.
3 Got it.

4 And are you aware that Larry Rosen is
5 the same law firm as Mr. Blumetti here today, or was
6 at the time?

7 A I am.

8 Q You are. Okay.

9 Michael Glassner, remind me what was
10 his role at the time, if you recall?

11 A I don't recall AJ.

12 Q Okay. Let's see. Okay.

13 Any other questions I can -- I'll
14 just contact your attorney about the privilege log.

15 MR. BLUMETTI: Sure.

16 MS. DELGADO: Okay. Make that faster.

17 Okay.

18 BY MS. DELGADO:

19 Q Do you or has anyone you know, including
20 your father, suggested or taken any steps to
21 safeguard women on the current campaign from Jason
22 Miller?

23 MR. BLUMETTI: Objection to form.

24 THE WITNESS: Is that really a serious
25 question, AJ?

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1 BY MS. DELGADO:

2 Q Very serious.

3 A AJ, I don't work with the campaign. I
4 think I told you that. I don't work for the
5 campaign.

6 Q Okay.

7 A I don't get paid by the campaign. I -- I
8 am not part of that apparatus on a day-to-day basis.

9 I don't even -- does Jason formally
10 work for the campaign? I don't -- I don't even
11 know.

12 Q He does.

13 A Does he?

14 Q Yes, he does Eric. He's on the --

15 (Simultaneous speakers)

16 THE WITNESS: Do me a favor, ask silly
17 provocative questions like that to people who
18 actually work in an apparatus, not a guy who
19 runs a real estate company, all right?

20 BY MS. DELGADO:

21 Q Eric, do you consider it silly to look out
22 for other women?

23 A I look out for women all the time. And,
24 in fact, the reason I'm sitting here today AJ is
25 because I was looking out for you and trying to help

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1 you. In fact, it's very sad that I've had to waste
2 three hours doing this in light of how kind and nice
3 and, you know, respectful and honorable as a friend
4 that I've always been to you.

5 But ask questions like that to people
6 who are actually involved in an apparatus and not
7 somebody who has nothing do with something.

8 Q You're the son, however, of the person
9 whose campaign it is. So why do you feel it's
10 improper to ask if you've made a suggestion,
11 including to your own father, perhaps?

12 A AJ -- I don't -- AJ, I don't know the
13 details of this lawsuit. I don't know the details
14 of the grievance that you have with -- with Jason,
15 at least not on micro-basis.

16 I'm in no position to be making
17 suggestions such as the ones that you're asking to
18 an entity that I don't work for and oftentimes try
19 to stay away from.

20 Q Are you aware that Miller also had an
21 involvement, a physical involvement with a
22 subordinate on the Ted Cruz campaign immediately
23 prior to joining the Trump Campaign?

24 A AJ, I'm not -- I stay in my own lane.
25 It's not my business. I'm not involved in this

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1 matter.

2 Q Fair enough. I think we are close to
3 being done. I'm going to flip through a couple of
4 documents in your production that I wanted to ask
5 you about and then that should be it.

6 Did you introduce anyone else to Brad
7 for -- I'll just leave it at that. Did you
8 introduce anyone else to Brad while he was at
9 America First?

10 MS. HABBA: Just -- can you just clarify,
11 for a job, do you mean? For employment?

12 BY MS. DELGADO:

13 Q General introduction. General
14 introduction.

15 A I don't remember back eight years. I had
16 a nice relationship with Brad. I'm sure I
17 introduced plenty of people to him over the years.
18 As to where and when, I have no idea, but I'm sure I
19 introduced people to Brad.

20 Q Is there anyone that you recall that you
21 introduced to Brad who then subsequently worked for
22 Brad at the PAC?

23 A Well, I introduced my wife to Brad and I
24 think -- well, she didn't work in the PAC, at least
25 not the best that I remember at this point. But I'm

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1 sure I introduced Brad over the years to -- to a
2 number of people. And I'm sure he's introduced me
3 to plenty of people as well. So -- so, you know,
4 he's a man I knew fairly well. And, you know, I
5 think that's why I introduced you to him.

6 Q But can you think of a name that did,
7 other than I think you eluded to your wife sort of.
8 Is there --

9 A AJ, as I sit here eight years later, I
10 can't possibly think of, you know, people I could
11 have introduced Brad to. I'm sure -- I'm sure I
12 introduced him to plenty, I'm sure he introduced me
13 to plenty.

14 Q Let's see. Just looking through.

15 Let me share my screen. It's a
16 document you produced.

17 Are you able to see it?

18 A Yeah, I am.

19 Q Is it correct to say this is your brother
20 circulating an article to you and to Alan Garten
21 about -- a not very nice article about me?

22 A I -- I vaguely remember this. I think
23 this is a New York Post story, is that right? Yeah,
24 Richard Johnson at the New York Post. Yeah, I mean,
25 this was probably -- yeah, I -- I vaguely remember

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1 seeing this.

2 Q Okay. And were you aware that Mr. Miller,
3 under oath, stated that it was your brother's
4 publicist who planted this story, Arthur Schwartz?

5 MR. BLUMETTI: Objection to form.

6 MS. DELGADO: I'll rephrase it.

7 BY MS. DELGADO:

8 Q Were you aware that Mr. Miller stated in a
9 2019 deposition that it was your brother's
10 publicist, Arthur Schwartz, who provided this story
11 to the New York Post?

12 A My brother's publicist Arthur Schwartz
13 that provided -- I -- I would have no idea.

14 Q Okay.

15 A I don't know why anybody would -- AJ, I
16 have no idea. I don't know why my mother would even
17 be -- no -- have anything to do with this.

18 Q Was your brother perhaps upset that I
19 hadn't signed that release?

20 MR. BLUMETTI: Objection to form.

21 MS. HABBA: Objection.

22 THE WITNESS: I have a suspicious feeling
23 that Don knew substantially less than even I
24 knew about this and I knew just about nothing,
25 so I don't think Don would have cared one way

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1 or the other.

2 BY MS. DELGADO:

3 Q Based on -- let me go to --

4 (Sotto Voce Discussion.)

5 BY MS. DELGADO:

6 Q There is another one I'm sharing which is
7 a confidential settlement communication,
8 November 11, 2019. Sent by an attorney representing
9 me to, in part, Larry Rosen.

10 Do you see that?

11 A I do not, no.

12 MS. HABBA: We can still see the Page 6
13 thing.

14 MS. DELGADO: Oh, gosh.

15 (Sotto Voce Discussion.)

16 BY MS. DELGADO:

17 Q Okay. Now it should work. Let me know if
18 you can see it now, perhaps?

19 A Nope.

20 Q Nope.

21 Okay. Let's try now. Now?

22 A Yeah, I see that now.

23 Q The confidential one? Yeah. Okay. With
24 red at that top. Sarelson & Co.

25 Do you see that?

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1 A Yes, I can.

2 Q How did this come to be in your
3 possession?

4 A I have no idea.

5 Q Do you think Larry Rosen, at some point,
6 sent it to you?

7 MS. HABBA: Asked and answered.

8 BY MS. DELGADO:

9 Q I'm just trying to help him refresh his
10 memory.

11 A AJ, I just don't know.

12 Q Would it be possible that Larry Rosen sent
13 it to you?

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: AJ, I don't know.

16 BY MS. DELGADO:

17 Q Okay. Same thing. I think that might be
18 it.

19 Quickly. Sorry, most of what you
20 produced is privileged, so I'm just quickly trying
21 to thumb through what was produced. Well, I should
22 say it's produced under a claim of privilege, not
23 necessarily privileged.

24 Okay.

25 MS. DELGADO: Give me one second. Feel

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1 free to sip on your water, whatnot, while I
2 wrap this up. I think after this we should be
3 done.

4 BY MS. DELGADO:

5 Q At one point, someone sent you the NDA I
6 signed, correct? Do you recall that?

7 A I don't recall that.

8 Q Okay.

9 A AJ, sitting here today. It's, I'm sure,
10 possible.

11 Q Okay. Your text messages are on Bates
12 stamp 261. And they go up to July 29, 2019 only.

13 A Uh-huh.

14 Q Do you not have text messages with me
15 after that?

16 A I don't have any text messages after --
17 after that.

18 Q Were there text messages after that? And
19 I asked -- text messages after that, just to be
20 clear why I am asking?

21 A Yeah, my -- my phone got screwed up at
22 some point and I didn't have anything -- I don't
23 have anything post -- post that.

24 Q Okay. There is something I wanted to ask
25 you about that's in those text messages, but it

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1 would require submitting the rest of the text
2 messages that I have from 2020, through present day.
3 And the problem is there's something in those that
4 is sensitive to you, and I don't want to put
5 anything sensitive into the record that's
6 embarrassing or -- or uncomfortable for you.

7 I think you probably know what I'm
8 referring to. So I think I'm just going to skip that
9 question overall because I would have to submit
10 the -- there's just no way to ask you about it
11 without also throwing up on the screen the rest of
12 it.

13 And I'm happy not to ask about that.
14 It's not my intent to --

15 MS. HABBA: You --

16 (Simultaneous speakers)

17 MS. HABBA: You are making a record as we
18 sit here. So if you're not going to ask about
19 something, I prefer that you just move on and
20 ask the question.

21 You are making a record. This is --

22 MS. DELGADO: Oh, I am making a record of
23 the fact that there are text messages that
24 weren't produced. I do need to state for the
25 record, there are text messages that I have and

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1 I have reason to believe perhaps your firm
2 had --

3 MS. HABBA: No.

4 MS. DELGADO: -- that were not produced.
5 I'm stating for the record that I am not going
6 to supplement this production or ask about it
7 out of the courtesy to Eric.

8 But I'm stating for the record, because it
9 might come into play later, as to whether you
10 produced everything you needed to produce that
11 this text message history is not complete.
12 That notwithstanding, I don't want to go into
13 any sensitive topics as would be required by my
14 bringing up the missing text messages here.

15 So I'm just going to leave this --

16 (Simultaneous speakers)

17 MS. HABBA: I just refer to you his
18 testimony. He did testify that something
19 happened to his phone. He doesn't have -- you
20 know, what he has was produced. We don't have
21 anything outside of the privilege log that you
22 don't have. So I'll just put that on the
23 record. I don't --

24 MS. DELGADO: Sure. I'm happy to have you
25 put that on the record. I'm explaining what I

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1 was stating what I stated on the record.

2 MS. HABBA: Is there another question?

3 MS. DELGADO: Okay. Let's see. I
4 think --

5 BY MS. DELGADO:

6 Q Do you recall, Eric, your brother passing
7 around to you or e-mailing to you any articles about
8 Miller or Rob Porter or anyone else?

9 A AJ, I don't. And if I got them, I
10 probably would have just moved past them because I
11 just don't care, no, to be honest.

12 Q Okay. And my last question is -- I think
13 it's my last -- hang on. I'm sorry. My son opened
14 the door.

15 (Sotto Voce Discussion.)

16 BY MS. DELGADO:

17 Q Just one second here. Just one second.

18 Okay. Okay. That's okay.

19 You said the last you had spoken to
20 Brad Parscale is a while -- I believe your word was
21 a while ago. Is that correct?

22 A I mean, certainly -- certainly about this,
23 yeah. I mean, I -- I -- I don't speak to Brad all
24 that often anymore. Not that there's anything
25 wrong, it's just he's -- he's doing mainly the

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1 political stuff and I'm obviously mainly on the
2 company side.

3 So off the top of my head, I can't --
4 I mean, it's possible that we've exchanged a text
5 here or there or something, a pleasantry, I just
6 don't remember the last time I truly went back and
7 forth with him in any meaningful -- meaningful way.

8 Q Okay. Leave it at that.

9 And forgive me if I've already asked
10 this, but has your father expressed any position
11 that you can recall on this lawsuit or on me at any
12 point?

13 A No. Not to me. At any point? I --
14 listen, I don't know at any point. I can't jog my
15 memory back, you know, ten years. But I -- not that
16 I would even -- I don't think this would ever be a
17 topic of conversation between my father and I, at
18 least not that I can remember.

19 Q Okay. I don't think I have anything else.
20 I think we can leave it there. I think I have
21 all -- you did answer already that you had provided
22 everything you have in response to the request that
23 came with your subpoena; correct?

24 MS. HABBA: With the assistance of
25 counsel.

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1 THE WITNESS: Yeah, my counsel pulled all
2 the searches.

3 MS. DELGADO: Okay. Yeah, I don't think I
4 have anything else then.

5 BY MS. DELGADO:

6 Q Last question. Eric, do you believe I
7 deserved the White House job, you personally?

8 MR. BLUMETTI: Objection to form.

9 MS. HABBA: Objection to form.

10 THE WITNESS: AJ, the White House
11 wasn't -- it wasn't my domain. I -- I don't
12 know enough about you, honestly. I thought
13 fondly of you when I knew you. I think a lot
14 of that's maybe changed since I got dragged
15 into something that I had nothing to do with,
16 and after some of the questions today. To tell
17 you the truth, it's a little disappointing in
18 somebody that I considered a friend.

19 But I can't render the qualifications of a
20 personal, you know, being hired to White House
21 when you know nothing about their background,
22 when you know nothing about qualifications, and
23 frankly what jobs were even open in the White
24 House. I just don't know. I don't know enough
25 about government.

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1 I can't speculate as to whether or not you
2 should be there. And by the way --

3 (Simultaneous speakers)

4 THE WITNESS: -- it's not my call to make.

5 BY MS. DELGADO:

6 Q Right. Any opinion on Jason Miller
7 entering the White House?

8 A I have no opinions on things that I'm not
9 involved with. It's a general rule of thumb to live
10 life by. But no, I have no opinion.

11 Q Fair enough. Just asking if you did.
12 Okay. We can leave it there. I think I have what I
13 need. And thank you Eric for your time. I know we
14 almost went right up to the three hours, so thanks
15 for your time. It was nice seeing you. Wish it
16 could have been under different circumstances. But
17 thank you for being here.

18 THE WITNESS: Likewise AJ. You take care
19 of yourself, all right.

20 MS. DELGADO: You take care. And take
21 care of those doggies and the kids.

22 *(The deposition was concluded at*
23 *12:45 p.m.)*
24
25

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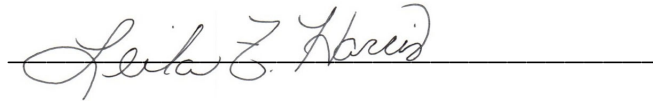
CERTIFICATE OF OATH

STATE OF FLORIDA)

COUNTY OF WALTON)

I, the undersigned authority, certify
that ERIC TRUMP remotely appeared before me and was
duly sworn.

WITNESS my hand and official seal
this 13th of March, 2024.



Leila Z. Harris, Stenographic Court Reporter

Notary Public - State of Florida

Commission No: HH 144004

My Commission Expires: September 13, 2025

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1 STATE OF FLORIDA)

2 COUNTY OF WALTON)

3 I, Leila Z. Harris, LCR (Tennessee), Court
4 Reporter, certify that I was authorized to and did
5 stenographically report the foregoing deposition;
6 and that the transcript is a true record of the
7 testimony given by the witness; Per Federal Civil
8 Procedure Rule 30(e) deponent witness did not
9 request to read and sign transcript.

10 I further certify that I am not a
11 relative, employee, attorney, or counsel of any of
12 the parties, nor am I a relative or employee of any
13 of the parties' attorney or counsel connected with
14 the action, nor am I financially interested in this
15 action.

16
17 

18 _____
19 Leila Z. Harris, LCR, FPR
20 Stenographic Court Reporter
21
22
23
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{PLAINTIFF} v.
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